

FASKEN

Fasken Martineau DuMoulin LLP
Barristers and Solicitors
Patent and Trade-mark Agents

550 Burrard Street, Suite 2900
Vancouver, British Columbia V6C 0A3
Canada

T +1 604 631 3131
+1 866 635 3131
F +1 604 631 3232

fasken.com

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Christopher R. Bystrom
Direct 604 631 4715
Facsimile 604 632 4715
cbystrom@fasken.com

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British Columbia Utilities Commission
Suite 410, 900 Howe Street
Vancouver, BC V6Z 2N3

**Attention: Mr. Patrick Wruck, Commission Secretary and Manager,
Regulatory Services**

Dear Sirs/Mesdames:

**Re: FortisBC Inc. (“FBC”) Rate Design and Rates for Electric Vehicle Direct Current
Fast Charging Service Application – Supplemental Argument**

In accordance with Order G-90-21, dated March 23, 2021, FBC files this Supplemental Reply Argument in response to the Supplemental Final Arguments filed by interveners related to whether the revenue variance between FBC’s interim and final electric vehicle (“EV”) charging rates should be refunded to FBC’s EV charging customers.

In FBC’s Supplemental Final Argument, FBC submitted that no action need be taken as the revenue variance is not material enough to impact FBC’s proposed EV charging rate.

The six interveners that filed Supplemental Final Arguments all take the view that no action need be taken regarding the variance between interim and final rates.

1. BC Sustainable Energy Association and Vancouver Electric Vehicle Association (“BCSEA-VEVA”) submit that no action is required, stating: “The variance is very small. Changing the interim rate to a new final rate in one step would be simpler to communicate to EV drivers than changing the rate again twice.”¹ FBC agrees.
2. Donald Flintoff (“Flintoff”) submits: “In light of the minor material amounts involved [FBC Supplemental Argument], no refunds would be in the public interest. The FBC cost

¹ BCSEA-VEVA Supplemental Final Submission, p. 2.

to refund the \$8,000 amount would not justify the effort. Therefore, a rate rider in the tariff is not necessary to be considered by the Panel.”² FBC agrees.

3. BC Hydro and Power Authority (“BC Hydro”) “in general supports FortisBC’s position articulated in its submission on April 6, 2021 that there is no need to direct a refund”.³ BC Hydro also submits that, to manage administrative costs and complexity, it supports allowing variances to flow through an applicable regulatory account “(in the instance of BC Hydro, it would be the Load Variance Regulatory Account)”.⁴ FBC agrees. In FBC’s case, the applicable regulatory account would be the Flow-through deferral account, which has already been approved by the BCUC to collect EV charging station revenue variances.⁵
4. Commercial Energy Consumers Association of British Columbia (“CEC”) “agrees with FBC and is of the view that no action need be taken for the \$8,000 difference.”⁶ The CEC submits “that the \$8,000.00 variance is very small and notes that FBC EV charging station customers may well be customers living and working in FBC territory and paying FBC electricity rates who would receive the benefit in any case” and notes “FBC’s position in its Final Argument that the rate should be exempt from rate changes, as the stable nature would help overcome barriers to adoptions.”⁷ FBC agrees.
5. British Columbia Old Age Pensioners’ Organization et al. (“BCOAPO”) submits “that the BCUC should adopt FBC’s preferred course of action that no action need be taken”.⁸ FBC agrees with the three-point rationale provided by BCOAPO.⁹
6. ChargePoint notes that the variance is small and submits that no action is needed.¹⁰ FBC agrees.

FBC submits that all parties in the proceeding agree that the variance between interim and final rates need not be refunded to EV charging customers.

In its Annual Review for 2022 rates, FBC will propose a method (such as through its Flow-through deferral account) to return to customers the 2018 to 2020 net revenue/costs associated

² Flintoff Supplemental Final Submission, p. 5.

³ BC Hydro Supplemental Final Argument, p. 1.

⁴ BC Hydro Supplemental Final Argument, pp. 2-3.

⁵ Exhibit B-5, Application, p. 23

⁶ CEC Supplemental Final Argument, p. 2.

⁷ CEC Supplemental Final Argument, p.3.

⁸ BCOAPO Supplemental Final Argument, pp. 2-3.

⁹ BCOAPO Supplemental Final Argument, p. 3.

¹⁰ ChargePoint Supplemental Final Argument, p. 1.

with its EV charging stations (a \$74 thousand surplus).¹¹ For 2021 and future years, any EV charging revenue variances will be captured in the Flow-through deferral account.¹²

Yours truly,

FASKEN MARTINEAU DuMOULIN LLP

[Original signed by]

Christopher Bystrom*

*Law Corporation

¹¹ Exhibit B-7, BCUC IR1 15.2 and 15.2.1.

¹² Exhibit B-5, Application, p. 23.