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March 12, 2024

BC Sustainable Energy Association  
c/o William J. Andrews, Barrister & Solicitor  
70 Talbot Street  
Guelph, ON  
N1G 2E9

Vancouver Electric Vehicle Association  
c/o Robert Sparks  
2021 Panorama Dr  
North Vancouver, BC  
V7G 1V2

**Attention: Mr. William J. Andrews**

**Attention: Mr. Robert Sparks**

Dear William J. Andrews and Robert Sparks:

**Re: FortisBC Inc. (FBC)**

**FBC Electric Vehicle (EV) Direct Current Fast Charge (DCFC) Energy-Based Rate Application (Application)**

**Response to the B.C. Sustainable Energy Association (BCSEA) and the Vancouver Electric Vehicle Association (VEVA) Information Request (IR) No. 1**

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On December 22, 2023, FBC filed the Application referenced above. In accordance with the regulatory timetable established in BCUC Order G-17-24 for the review of the Application, FBC respectfully submits the attached response to BCSEA-VEVA IR No. 1.

For convenience and efficiency, if FBC has provided an internet address for referenced reports instead of attaching the documents to its IR responses, FBC intends for the referenced documents to form part of its IR responses and the evidentiary record in this proceeding.

If further information is required, please contact the undersigned.

Sincerely,

**FORTISBC INC.**

***Original signed:***

Sarah Walsh

Attachments

cc (email only): Commission Secretary  
Registered Parties



FortisBC Inc. (FBC or the Company) FBC Electric Vehicle (EV) Direct Current Fast Charge (DCFC) Energy-Based Rate Application (Application)	Submission Date: March 12, 2024
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1 **1.0 Topic: Temporary Dispensation**

2 **Reference: Exhibit B-1, p.2, lines 30-32; p.18, lines 19-23**

3 On page 18 of the Application, FBC states:

4 “FBC applied to Measurement Canada’s temporary dispensation program on  
5 December 18, 2023 for all of its existing EV DCFC charging stations and expects  
6 to receive approval in early 2024. Once approved, the temporary dispensation  
7 program will enable energy-based (i.e., kWh) metering for stations that were in-  
8 service prior to July 1, 2024 without verification and sealing, subject to the terms  
9 and conditions of the temporary dispensation program.” [pdf p.22]

10 1.1 What is the current status of Measurement Canada’s response to FBC’s  
11 application for a temporary dispensation to use energy-based (kWh) meters for  
12 billing purposes at FBC’s Level 3 charging stations?

13  
14 **Response:**

15 Please refer to the response to BCOAPO IR1 2.3.

16  
17

18  
19 1.2 What is the anticipated duration of the temporary dispensation that FBC has  
20 sought from Measurement Canada?

21  
22 **Response:**

23 According to Measurement Canada, the scope and duration of the temporary dispensation is as  
24 follows:<sup>1</sup>

- 25 1. This dispensation only applies to an owner identified in the Declaration in the form  
26 of Appendix B filed with Measurement Canada and in respect of the list of eligible  
27 EVSE attached to that Declaration as required by paragraph (A)(1)(b) above.  
28 When ownership or the inventory of meters has changed, this temporary  
29 dispensation is no longer valid in respect of those meters and will not apply unless  
30 a new Declaration or list is provided to Measurement Canada at the time of the  
31 change.
- 32 2. This dispensation is in effect from February 20, 2023, until the earliest of the  
33 following dates:

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<sup>1</sup> <https://ised-isde.canada.ca/site/measurement-canada/en/consultations/temporary-dispensation-level-3-electric-vehicle-supply-equipment>.



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- 1           1. December 31, 2029, at 23:59 (EST); or
  - 2           2. The date on which the dispensation is cancelled in writing by the President
  - 3           of Measurement Canada, where the President is of the opinion that the
  - 4           integrity and accuracy of the electricity meters covered by this dispensation
  - 5           are unlikely to be maintained, or that it is no longer in the public interest.
- 6 Any additional requirements or specifications beyond December 31, 2029 are not known at this
- 7 time. FBC expects to address any new requirements that may be announced by Measurement
- 8 Canada prior to the end of the temporary dispensation program.

9

10

11

12           1.3     Please explain what happens when the temporary dispensation comes to an end.

13

14     **Response:**

15     Please refer to the response to BCSEA-VEVA IR1 1.2.

16

17

18

19           1.4     Please discuss FBC’s intentions regarding future replacement of existing

20           equipment with equipment that meets Measurement Canada’s forthcoming

21           requirements for energy-based (kWh) meters for billing purposes at FBC’s Level 3

22           charging stations.

23

24     **Response:**

25     For any replacements after July 1, 2024, but prior to the end of the temporary dispensation on

26     December 31, 2029, FBC’s intention is to install only station equipment that would meet the

27     additional verification requirements of Measurement Canada in order to receive temporary

28     dispensation approval for the replacement stations.

29     As explained in the response to BCSEA-VEVA IR1 1.2, the requirements and specifications for

30     stations installed after December 31, 2029 are not known at this time, but it would be FBC’s

31     intention that any new or replacement stations installed would meet the requirements at that time.

32

33

34



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1           1.5    Is FBC’s cost of implementing energy-based (kWh) meters that comply with  
2                    Measurement Canada’s forthcoming requirements factored into the ten-year  
3                    levelization of revenue and costs? If not, please explain why not.

4  
5    **Response:**

6    For replacement stations installed after July 24, 2024, FBC does not expect there will be material  
7    incremental costs for complying with the requirements from Measurement Canada, whether for  
8    the temporary dispensation for stations installed prior to December 31, 2029 or for new  
9    requirements beyond December 31, 2029. Regardless, as explained on page 24 of the  
10   Application, FBC included proxies of future capital expenditures for minor repairs or parts  
11   replacement which would include any incremental costs to ensure the replacement stations meet  
12   Measurement Canada requirements.

13   For any new stations (i.e., not replacements) installed after July 24, 2024 but prior to December  
14   31, 2029, FBC expects any costs related to compliance with the temporary dispensation will be  
15   part of the capital costs of the new stations. As explained on page 36 of the Application, FBC will  
16   continue the approach directed by the BCUC in Order G-341-21 of introducing new stations as  
17   part of FBC’s annual review or revenue requirement proceedings. FBC will evaluate at that time  
18   whether the levelized rate under RS 96 needs to be recalculated as a result of any new station(s).

19  
20

21  
22           1.6    Please discuss the relationship, if any, between the end of the proposed  
23                    levelization period (2033) and the end of the Measurement Canada temporary  
24                    dispensation to bill using energy-based DCFC meters.

25  
26    **Response:**

27    There is no relationship between the end of the proposed levelization period and the end of the  
28    Measurement Canada temporary dispensation. Please refer to the response to BCUC IR1 3.1 for  
29    an explanation of the proposed 10-year levelization period up to 2033.

30

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1   **2.0   Topic:           Level Playing Field**

2                               **Reference: Exhibit B-1, p.13; Decision and Order G-341-21, 16 of 32,**  
3                               **pdf p.18**

4           On page 13 of the Application, FBC states:

5                               “Table 2-5 below provides a comparison of current or proposed energy-based  
6                               charging rates from EV DCFC service providers in BC with information publicly  
7                               available. Given Measurement Canada’s temporary dispensation program was  
8                               announced in early 2023, only a limited number of service providers are offering  
9                               energy-based charging at the time of filing this Application. Both Electrify Canada  
10                              and Parkland (Chevron) have announced conversions to energy-based charging  
11                              in early 2024 but no rate information is publicly available at this time.

12                             FBC’s proposed energy-based rate of \$0.42 per kWh for both 50 kW and 100 kW  
13                             DCFC stations is higher than the energy-based rates of BC Hydro and Tesla, but  
14                             is generally comparable to other service providers in BC such as Shell, Couche-  
15                             Tard, and Charger Quest. Depending on the location, FBC’s proposed energy-  
16                             based rate is comparable to Tesla’s offering of \$0.42 per kWh.

17                             Additionally, FBC notes that Tesla is currently offering a variety of rates based on  
18                             region as well as utilization rates for each individual charging station. For example,  
19                             Tesla superchargers in Vancouver and the Lower Mainland are based on Time of  
20                             Use (TOU) and, depending on the utilization of the station, the charging rates can  
21                             be as low as \$0.13 per kWh in the evening hours. In contrast, Tesla currently does  
22                             not offer TOU charging rates in FBC’s service area, but their rates vary by region  
23                             and range from \$0.26 per kWh to \$0.42 per kWh.

24                             Excluding Tesla, all other service providers, including FBC, with energy-based  
25                             rates have (or propose to have) the same \$ per kWh rate for all power levels of  
26                             their DCFC stations.” [pdf p.17]

27           On page 16 of 32, pdf p.18, in its Reasons for Order G-341-21, the Panel states:

28                             “We consider a rate that supports the development of a competitive market to be  
29                             just and reasonable. As previously stated by the BCUC,

30                                       ‘It is in the public interest to ensure that the playing field remains as level as  
31                                       possible. There is an opportunity for thoughtful regulation to ensure that non-  
32                                       exempt public utility investments don’t have the end effect of crowding out  
33                                       exempt utility investment; [EV Inquiry Report Phase 2, p. 29]”

34           2.1   In FBC’s view, will the proposed energy-based rates for FBC’s EV DCFC service  
35                             have the end effect of crowding out exempt utility investment?  
36



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1 **Response:**

2 Concurrently with these IR responses, FBC has filed an Evidentiary Update to the Application  
3 which updates FBC's proposed energy-based rate from \$0.42 per kWh to \$0.39 per kWh. FBC is  
4 responding to this information request based on the updated proposed energy-based rate.

5 The proposed energy-based rate at \$0.39 per kWh will not "crowd out" exempt utility investment.  
6 The proposed energy-based rate, which is based on all applicable utility costs, remains at the  
7 higher end of Tesla's offering in FBC's service area (i.e., between \$0.26 and \$0.42 per kWh) and  
8 continues to be comparable to the offering from Charger Quest (i.e., between \$0.40 and \$0.45  
9 per kWh). FBC's proposed energy-based rate is also higher than BC Hydro's proposed energy-  
10 based rate of \$0.34 per kWh.

11





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1   **4.0   Topic:           Levelization Period**

2                               **Reference: Exhibit B-1, Section 3.2.1.1, p. 19**

3           On page 19 of the Application, FBC says that “FBC’s RS [Rate Schedule] 96 EV charging  
4           rates were originally set on a levelized-cost basis from 2018 to 2030 for the 50 kW stations  
5           (13 years) and from 2021 to 2030 for the 100 kW stations (10 years)” and that in the  
6           current Application “FBC is proposing to reset the rates for its EV DCFC service starting  
7           in 2024 over a 10-year levelization period (i.e., 2024 to 2033). [pdf p.23]

8           4.1    What would be the energy-based rates if they were based on the original  
9           levelization periods rather than 2024 to 2033 as proposed?

10

11   **Response:**

12   Please refer to the response to BCUC IR1 3.1.

13





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1   **5.0   Topic:            Accessibility Capital**

2                           **Reference: Exhibit B-1, p.23, lines 8-15**

3           On page 23 of the Application, FBC states:

4                           “The remaining capital expenditures in 2023 Projected and the 2024 Forecast  
5                           capital expenditures are related to the accessibility improvement work at FBC’s  
6                           existing EV DCFC sites which was started in 2023. As identified in the RS 96  
7                           Assessment Report, FBC worked with a focus group on accessibility  
8                           improvements to its existing EV DCFC sites. As a result, FBC is modifying its  
9                           existing sites for accessibility improvements in 2023 and 2024, including new or  
10                           additional lighting (as the stations are available for use 24 hours a day) and paving  
11                           for wheelchair access to the chargers. Currently, FBC has completed  
12                           improvements at two sites with the remaining sites anticipated to be completed in  
13                           2024. ...” [pdf p.27]

14           5.1   Does FBC anticipate capital costs for accessibility improvements during the 10-  
15                           year levelized period but after 2024 (i.e., 2025 to 2033)?

16  
17   **Response:**

18   FBC does not currently have plans for additional accessibility improvement work beyond the  
19   improvements completed in 2023 and planned for 2024. As noted on page 24 of the Application,  
20   FBC included a proxy for future capital expenditures in the calculation of the energy-based rate  
21   over the 10-year levelization period for minor repairs or replacements, which could include small  
22   accessibility improvement work.

23   For significant improvement work or for additional accessibility upgrades due to new guidelines  
24   or standards that might arise during the proposed 10-year levelization period, FBC will continue  
25   with the current approach of seeking approval of the costs related to this work as part of the  
26   annual review or revenue requirement process. Depending on the circumstances, including the  
27   level of capital required and whether FBC’s EV DCFC service is at a surplus or deficit position,  
28   FBC could propose to update the energy-based rate at that time.

29  
30

31  
32           5.2   What happens if new guidelines or standards require additional accessibility  
33                           upgrades during the 2025 to 2033 period?

34  
35   **Response:**

36   Please refer to the response to BCSEA-VEVA IR1 5.1.









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1 The actual revenue received from FBC’s monetization of the carbon credits does not further  
2 reduce the EV charging rates paid by EV customers.

3 The variances between the actual carbon credit revenue and the forecasts built into the proposed  
4 energy-based rate will be captured in the Flow-through deferral account. These variances, which  
5 could be credits or debits depending on whether the actual carbon credit revenue is more or less  
6 than the forecast included in the energy-based rate cost of service calculation, will be captured in  
7 the Flow-through deferral account and will be amortized into the rates of FBC’s other customers.

8  
9

10

11 8.3 Please explain how the financial treatment of revenue (forecast or actual) from EV  
12 driver/customers for DCFC service compares with the treatment of revenue  
13 (forecast or actual) from carbon credits associated with the DCFC service.

14

15 **Response:**

16 There is no difference in the treatment of the revenue from EV customers for FBC’s DCFC service  
17 and the revenue from the monetization of the carbon credits. As explained in the Application and  
18 referenced in the preamble above, the costs and revenues of FBC’s EV DCFC service and the  
19 carbon credits are approved to be treated as flow-through by Orders G-215-21 and G-341-21,  
20 respectively. Any variances between actual and forecast amounts are captured in the Flow-  
21 through deferral account and amortized into the rates of FBC’s other customers.

22





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1   **10.0   Topic:            Potential Bill Impact**

2                               **Reference: Exhibit B-1, p.37, lines 14-16; p.33, line 2**

3           On page 33, Table 3-7 shows Avg. Residential Bill Impact of \$0.28 per year under the Low  
4           Growth Scenario. [pdf p.37, underline added]

5           On page 37 of the Application, FBC states:

6                               “The potential rate impact for the average residential customer is approximately 28  
7                               cents per year over the 10-year period from 2024 to 2033 if a low EV growth  
8                               environment materializes.” [pdf p.41, underline added]

9           10.1   Should the statement on page 37 read “bill impact”?

10

11   **Response:**

12   Confirmed. The statement on page 37 of the Application should read “bill impact”.

13



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1   **11.0   Topic:            Idling Charge**  
2                               **Reference: Exhibit B-1, p.14, lines 3-5, 7-10; p.18, lines 34-35;**  
3                               **Section 3.4 Proposed Idling Charge, p.33, lines 3-23**

4           On page 14 of the Application, FBC states:

5                               “With the adoption of energy-based rates, most EV DCFC service providers are  
6                               also introducing Idling Charges to encourage customers to move-on once charged  
7                               in order to discourage unnecessary congestion at charging stations. ...

8                               FBC has proposed an Idling Charge of \$0.40 per minute which is comparable to  
9                               most other service providers’ Idling Charges, with the approach of including a  
10                              grace period (i.e., if the vehicle is moved after 5 or 10 minutes after the end of  
11                              charging) being generally consistent with other service providers, including Tesla.”  
12                              [pdf p.18, underline added]

13          On page 18 of the Application, FBC states:

14                              “This section also includes FBC’s proposed Idling Charge to prevent unnecessary  
15                              congestion at its stations.” [pdf p.22, underline added]

16          On page 33 of the Application, FBC states:

17                              “FBC has not received any complaints to date about idling or congestion at its EV  
18                              DCFC stations; however, FBC expects the issue of congestion is likely to arise in  
19                              the near future with the increase in EV sales and as the utilization of FBC’s stations  
20                              continues to grow, especially at high traffic stations such as the Kelowna Museum  
21                              and Princeton.

22                              Currently, FLO has indicated that their system is not capable of accommodating  
23                              both an energy based rate and a time-based Idling Charge. FLO has  
24                              communicated to FBC that upgrading their system to accommodate an Idling  
25                              Charge is part of their development plan but not expected to be implemented until  
26                              late 2024.” [pdf p.37, underline added]

27           11.1   Please confirm, or otherwise explain, that the purpose of the proposed Idling  
28                              Charge is to encourage customers to move-on once charged in order to  
29                              discourage unnecessary congestion at charging stations.

30  
31    **Response:**

32    Confirmed.

33  
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1           11.2    Please describe in greater detail how FBC intends to apply the Idling Charge (upon  
2                    the effective date of approval). Will the Idling Charge be applied to all stations and  
3                    all sites, or to stations and sites selected by FBC? Will the Idling Charge be applied  
4                    'all day, every day'? Or only at times selected by FBC?  
5

6    **Response:**

7    Please refer to the response to BCUC IR1 9.2.  
8  
9

10  
11           11.3    Has FBC considered implementing a limitation based on an EV's 'state of charge'  
12                    at times when stations at a certain site are congested? Would FLO be able to  
13                    implement such an option?  
14

15   **Response:**

16    Charge rates generally begin to drop significantly for most EV models once the state of charge  
17    reaches approximately 80 percent. Therefore, FBC has considered implementing maximum state  
18    of charge limitations based on the number of chargers in use at a particular site in order to promote  
19    efficient use. However, this functionality is not expected to be available from FLO in the near  
20    future and therefore will not be available to implement when FBC introduces the Idling Charge (if  
21    approved by the BCUC). FBC will continue to consider state of charge options, particularly at sites  
22    and times where sites are most congested, and might propose such an option if this functionality  
23    is developed and made available by FLO.

24



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1   **13.0   Topic:            Like-for-like replacement of EV chargers**  
2                               **Reference: Exhibit B-1, section 3.2.1.4, Capital Expenditures and**  
3                               **Contributions, pdf 28; section 3.3.2.2, Utilization Between 50 kW and**  
4                               **100 kW EV DCFC Stations, pdf 35**

5           On page 24 of the Application, FBC states:

6                               “As part of the forecast cost of service from 2024 to 2033, FBC has included an  
7                               estimate of \$25 thousand in 2023 dollars plus annual inflation for future  
8                               sustainment capital expenditures within the evaluation period, as minor repairs or  
9                               parts replacement such as power electronics or charging connectors/cables are  
10                              expected to occur from time to time. Furthermore, given the expected 10-year  
11                              service life of the EV chargers, FBC included future like-for-like replacement costs  
12                              at the end of the 10-year expected service life of each charger, estimated based  
13                              on the costs of the EV chargers in today’s dollars escalated annually by the inflation  
14                              assumption discussed in Section 3.2.1.6.” [pdf p.28, underline added]

15           On page 31 of the Application, FBC states:

16                              “FBC’s utilization information demonstrates that the price differential did not help  
17                              to promote more utilization of the lower power level stations. EV charging  
18                              customers are choosing the higher powered EV DCFC stations for reasons other  
19                              than price, such as the duration of charging time over the price differential, and it  
20                              is likely that the 50 kW stations are typically used at times when the 100 kW  
21                              stations are occupied, or the EV is limited by the charging speed depending on the  
22                              brand/model of the vehicle. ...” [pdf p.35, underline added]

23           13.1   In light of FBC’s observation that EV charging customers are choosing the 100 kW  
24                              chargers over the 50 kW chargers, has FBC considered replacing its 50 kW  
25                              chargers with 100 kW chargers when the 50 kW chargers are due to be replaced?

26                              13.1.1   If not, why not?

27                              13.1.2   How much extra would it cost to replace 50 kW chargers with 100 kW  
28                              chargers when the 50 kW chargers are due to be replaced? What would  
29                              be the impact on the levelized EV DCFC rates?  
30

31   **Response:**

32   Concurrently with these IR responses, FBC has filed an Evidentiary Update to the Application  
33   which updates FBC’s proposed energy-based rate from \$0.42 per kWh to \$0.39 per kWh. FBC is  
34   responding to this information request based on the updated proposed energy-based rate from  
35   the Evidentiary Update.

36   FBC currently does not have plans to replace its 50 kW stations with 100 kW stations or stations  
37   with even higher charge rates. However, FBC will consider this option when the 50 kW stations



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1 are due for replacement. This would depend on a number of factors, including the utilization of  
2 the 50 kW stations versus the 100 kW stations at that time as well as developments in the EV and  
3 DCFC station market.

4 Based on the current cost of DCFC stations, the incremental cost to replace a 50 kW station with  
5 a 100 kW station is small, estimated to be approximately \$0.030 million in 2024 dollars. Some  
6 stations might require additional costs to upgrade the existing electrical service and infrastructure  
7 to support the increased capacity of 100 kW chargers.

8 If FBC included the additional incremental cost of \$0.030 million (in 2024 dollars) per 50 kW  
9 station<sup>2</sup> at the time of replacing each station and also included the increase in electricity costs  
10 resulting from the higher power (i.e., 100 kW) replacement stations, the 10-year levelized rate  
11 would increase to \$0.44 per kWh, compared to the updated proposed rate of \$0.39 per kWh from  
12 the Evidentiary Update.

13 FBC considers the assumptions and inputs in the proposed energy-based rate of \$0.39 per kWh  
14 to be the most reasonable as FBC currently has no plans to replace its 50 kW stations with 100  
15 kW stations (or with stations at other power levels). Ultimately, as stated in the Application, FBC  
16 will continue to provide updates to its EV DCFC service as part of its annual review or revenue  
17 requirement proceedings. If FBC determines that existing 50 kW stations should be replaced with  
18 100 kW stations or other higher power stations due to the factors described above, FBC will  
19 include the changes as part of its annual review or revenue requirement proceedings and will  
20 assess whether the levelized rate needs to be changed at that time, subject to BCUC review and  
21 approval.

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<sup>2</sup> As noted on page 24 of the Application, FBC already included like-for-like replacement costs in the calculation of the proposed energy-based rate over the 10-year levelization period; therefore, only the incremental cost is added to the calculation for the purpose of this information request.



