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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

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



Submission Date: March 12, 2024

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

1	1.0	Topic	: Temporary Dispensation
2			Reference: Exhibit B-1, p.2, lines 30-32; p.18, lines 19-23
3		On pa	ge 18 of the Application, FBC states:
4 5 6 7 8 9			"FBC applied to Measurement Canada's temporary dispensation program on December 18, 2023 for all of its existing EV DCFC charging stations and expects to receive approval in early 2024. Once approved, the temporary dispensation program will enable energy-based (i.e., kWh) metering for stations that were inservice prior to July 1, 2024 without verification and sealing, subject to the terms and conditions of the temporary dispensation program." [pdf p.22]
10 11 12 13	Respe	1.1 onse:	What is the current status of Measurement Canada's response to FBC's application for a temporary dispensation to use energy-based (kWh) meters for billing purposes at FBC's Level 3 charging stations?
15	Please	e refer t	to the response to BCOAPO IR1 2.3.
16 17			
18 19 20 21	Respo	1.2	What is the anticipated duration of the temporary dispensation that FBC has sought from Measurement Canada?
		_	
23 24	follow	•	Measurement Canada, the scope and duration of the temporary dispensation is as
25 26 27 28 29 30	1.	of App EVSE When disper	dispensation only applies to an owner identified in the Declaration in the form bendix B filed with Measurement Canada and in respect of the list of eligible attached to that Declaration as required by paragraph (A)(1)(b) above. ownership or the inventory of meters has changed, this temporary insation is no longer valid in respect of those meters and will not apply unless a Declaration or list is provided to Measurement Canada at the time of the line.
32 33	2.		dispensation is in effect from February 20, 2023, until the earliest of the ing dates:

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



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### FortisBC Inc. (FBC or the Company) FBC Electric Vehicle (EV) Direct Current Fast Charge (DCFC) Energy-Based Rate Application (Application)

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

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

#### Response:

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

1.4 Please discuss FBC's intentions regarding future replacement of existing equipment with equipment that meets Measurement Canada's forthcoming requirements for energy-based (kWh) meters for billing purposes at FBC's Level 3 charging stations.

#### Response:

- For any replacements after July 1, 2024, but prior to the end of the temporary dispensation on December 31, 2029, FBC's intention is to install only station equipment that would meet the additional verification requirements of Measurement Canada in order to receive temporary dispensation approval for the replacement stations.
- As explained in the response to BCSEA-VEVA IR1 1.2, the requirements and specifications for stations installed after December 31, 2029 are not known at this time, but it would be FBC's intention that any new or replacement stations installed would meet the requirements at that time.



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

#### Response:

- For replacement stations installed after July 24, 2024, FBC does not expect there will be material incremental costs for complying with the requirements from Measurement Canada, whether for the temporary dispensation for stations installed prior to December 31, 2029 or for new requirements beyond December 31, 2029. Regardless, as explained on page 24 of the Application, FBC included proxies of future capital expenditures for minor repairs or parts replacement which would include any incremental costs to ensure the replacement stations meet Measurement Canada requirements.
- For any new stations (i.e., not replacements) installed after July 24, 2024 but prior to December 31, 2029, FBC expects any costs related to compliance with the temporary dispensation will be part of the capital costs of the new stations. As explained on page 36 of the Application, FBC will continue the approach directed by the BCUC in Order G-341-21 of introducing new stations as part of FBC's annual review or revenue requirement proceedings. FBC will evaluate at that time whether the levelized rate under RS 96 needs to be recalculated as a result of any new station(s).

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

#### Response:

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



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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, pdf p.18
4		On pa	ige 13 of	the Application, FBC states:
5 6 7 8 9 10			chargir availab annour energy and Pa	2-5 below provides a comparison of current or proposed energy-based ng rates from EV DCFC service providers in BC with information publicly ble. Given Measurement Canada's temporary dispensation program was need in early 2023, only a limited number of service providers are offering based charging at the time of filing this Application. Both Electrify Canada arkland (Chevron) have announced conversions to energy-based charging a 2024 but no rate information is publicly available at this time.
12 13 14 15			DCFC is gene Tard, a	proposed energy-based rate of \$0.42 per kWh for both 50 kW and 100 kW stations is higher than the energy-based rates of BC Hydro and Tesla, but erally comparable to other service providers in BC such as Shell, Coucheand Charger Quest. Depending on the location, FBC's proposed energy-rate is comparable to Tesla's offering of \$0.42 per kWh.
17 18 19 20 21 22 23			region Tesla s Use (T be as l not offe	nally, FBC notes that Tesla is currently offering a variety of rates based on as well as utilization rates for each individual charging station. For example, superchargers in Vancouver and the Lower Mainland are based on Time of OU) and, depending on the utilization of the station, the charging rates can ow as \$0.13 per kWh in the evening hours. In contrast, Tesla currently does er TOU charging rates in FBC's service area, but their rates vary by regioninge from \$0.26 per kWh to \$0.42 per kWh.
24 25 26			rates h	ing Tesla, all other service providers, including FBC, with energy-based have (or propose to have) the same \$ per kWh rate for all power levels of CFC stations." [pdf p.17]
27		On pa	ige 16 of	32, pdf p.18, in its Reasons for Order G-341-21, the Panel states:
28 29				onsider a rate that supports the development of a competitive market to be d reasonable. As previously stated by the BCUC,
30 31 32 33			p e	t is in the public interest to ensure that the playing field remains as level as ossible. There is an opportunity for thoughtful regulation to ensure that non-xempt public utility investments don't have the end effect of crowding out xempt utility investment; [EV Inquiry Report Phase 2, p. 29]"
34 35		2.1		c's view, will the proposed energy-based rates for FBC's EV DCFC service ne end effect of crowding out exempt utility investment?



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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.



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1	3.0 T	opic:	Energy-Based Rates
2			Reference: Exhibit B-1, p.18, lines 12-18
3	C	n page 18 o	f the Application, FBC states:
4 5 6 7 8 9 10 11		commerce Fast Control that we energy Measure commerce FBC commerce	d on the comments from the BCUC and interveners, as well as the letters of ents in FBC's Revised Application, BC Hydro's Application for Public Electric charging Service Rates in 2021 and BC Hydro's current renewed application as filed on July 28, 2023, FBC considers that there is general support for y-based metering for EV DCFC stations. Further, in recognition of the temporary dispensation program for ercial level 3+ EV charging devices which occurred on February 20, 2023, considers it is reasonable to establish an energy-based rate for its EV DCFC
12		service	e." [pdf p.22]
13 14 15 16 17 18	3	time-b time-b	sidering its decision to propose energy-based rates rather than the current ased rates for its public DCFC service, did FBC hear support for retaining ased rates? If so, please describe the stated reasons for the support for ng time-based rates, and please explain why FBC chose to propose energy-rates.
19	Respons	se:	

#### kesponse:

FBC has not received any feedback in support of retaining time-based rates. 20



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1	4.0	Горіс:	Levelization Period	
2			Reference: Exhibit B-1, Section 3.2.1.1, p. 19	
3 4 5 6 7	r ( c	On page 19 of the Application, FBC says that "FBC's RS [Rate Schedule] 96 EV chargerates were originally set on a levelized-cost basis from 2018 to 2030 for the 50 kW stati (13 years) and from 2021 to 2030 for the 100 kW stations (10 years)" and that in current Application "FBC is proposing to reset the rates for its EV DCFC service star in 2024 over a 10-year levelization period (i.e., 2024 to 2033). [pdf p.23]		
8 9 10 11	Respon	lev	hat would be the energy-based rates if they were based on the original relization periods rather than 2024 to 2033 as proposed?	

12 Please refer to the response to BCUC IR1 3.1.



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#### FortisBC Inc. (FBC or the Company) FBC Electric Vehicle (EV) Direct Current Fast Charge (DCFC) Energy-Based Rate Application (Application)

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

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1	5.0	Topic:	Accessibility Capital
2			Reference: Exhibit B-1, p.23, lines 8-15
3		On page	e 23 of the Application, FBC states:
4		"	The remaining capital expenditures in 2023 Projected and the 2024 Forecast
5		C	capital expenditures are related to the accessibility improvement work at FBC's
6		$\epsilon$	existing EV DCFC sites which was started in 2023. As identified in the RS 96
7		A	Assessment Report, FBC worked with a focus group on accessibility
8		iı	mprovements to its existing EV DCFC sites. As a result, FBC is modifying its
9		$\epsilon$	existing sites for accessibility improvements in 2023 and 2024, including new or
10		a	additional lighting (as the stations are available for use 24 hours a day) and paving
11		f	or wheelchair access to the chargers. Currently, FBC has completed
12		iı	mprovements 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		٧	rear levelized period but after 2024 (i.e., 2025 to 2033)?

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, FBC could propose to update the energy-based rate at that time. 28

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

35 Response:

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



# FortisBC Inc. (FBC or the Company) FBC Electric Vehicle (EV) Direct Current Fast Charge (DCFC) Energy-Based Rate Application (Application)

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1	6.0	Topic	: Criteria for Additional EV Charging Stations
2			Reference: Exhibit B-1, pp.23-24
3		On pa	ages 23-24 of the Application, FBC states:
4 5 6 7 8 9 10 11			"Currently, FBC is not forecasting construction of any new additional stations between 2024 and 2033, as such FBC did not include capital expenditures or new revenue for new stations in the forecast cost-of-service analysis to 2033. However, FBC will continue to monitor the station utilization and customer demand to determine if additional stations are warranted. As directed by Order G-341-21, if FBC introduces additional EV charging stations that were not originally identified in the Revised Application, FBC will include the evaluation of these additional stations as part of its Annual Review or revenue requirement proceedings." [pdf pp.27-28]
13 14 15	Resp	6.1 onse:	What are the criteria for additional EV charging stations being warranted?
16 17 18 19	monit qualit	tors qua	set firm parameters that determine the requirement for new charging stations. FBC intitative utilization and congestion measures at its charging stations, as well as istomer experience feedback received through PlugShare.com. In addition, FBC current and expected availability of third-party charging in the communities it serves.
20 21			
22 23 24 25 26		6.2	Does FBC anticipate future customer demand for EV DCFC stations with greater than 100 kW power during the 10-year levelization period? If so, how would FBC respond?
27	Resp	onse:	
28	Pleas	se refer t	to the response to BCUC IR1 8.1.



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1 7.0 Topic: **Depreciation Rate** 2 Reference: Exhibit B-1, p.26, lines 11-16 3 On page 26 of the Application, FBC states: "Pursuant to Order G-341-21, FBC was approved to use a straight-line 10 percent 4 5 (10-year) depreciation rate for its EV DCFC stations. The expected service life of 6 10 years (for both 50 kW and 100 kW stations) remains reasonable and continues 7 to be supported by FBC's EV charger vendor (i.e., AddEnergie, operator of the 8 FLO EV charging network) which has EV charging stations installed since 2015. 9 The 10-year expected service life also remains consistent with a number of 10 jurisdictions, as follows: ..." [pdf p.30] 11 7.1 Please discuss how the approved straight-line 10 percent depreciation rate for 12 FBC's EV DCFC stations is affected, if at all, by the possibility of having to replace 13 existing equipment with equipment that meets Measurement Canada's anticipated 14 requirements for energy-based billing (i.e., without a temporary dispensation). 15

#### Response:

Please refer to the response to BCUC IR1 1.3. Even in the unlikely event that one or more stations do not qualify for temporary dispensation, the result would not be that the station(s) would have to be removed and retired early. Instead, FBC would work with Measurement Canada and FLO to implement the changes required to receive temporary dispensation, or FBC would continue to charge time-based rates at the station(s). As such, FBC expects all stations would continue to be in-use and there would be no impact to the 10 percent depreciation rate.

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

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1	8.0	Topic	: Carbon Credits
2 3 4			Reference: Exhibit B-1, section 3.2.1.8 Carbon Credits, pp.27-28; p.10, lines 7-9; Appendix E, Financial Schedules and Cost of Service Models, pdf p.106, p.113
5		On pa	ge 27 of the Application, FBC states:
6 7 8 9 10			"Pursuant to Order G-341-21, the monetized value of the carbon credits related to EV stations that FBC earns under the BC-LCFS is recorded in Other Revenue and is subject to flow-through treatment (i.e., variances between forecast and actual amounts are captured in the Flow-through deferral account and are recovered from/returned to customers through rates in subsequent years)." [pdf p.31]
11 12			explaining its going-forward reduction in the estimated dollar value per carbon credit, states on page 28:
13 14 15 16			"Further, as discussed previously, any variance between forecast and actual carbon credit monetization will be captured in the Flow-through deferral account and will be recovered from or returned to all other FBC customers through rates in the subsequent years." [pdf p.32]
17		On pa	ge 10 of the Application, FBC states:
18 19 20 21			"FBC notes that as approved by Order G-215-21, the cost of service of FBC's EV DCFC stations is subjected to flow-through treatment, with the annual surplus or deficiency returned to or recovered from all customers." [pdf p.14, footnotes omitted]
22 23			inancial Schedules and Cost of Service Models for 50 kW and 100 kW stations show in Credit Revenue in Lines 7 and 110.
24 25 26		8.1	Please confirm, or otherwise explain, that FBC's revenue from carbon credits associated with FBC's EV DCFC service is included in the levelized revenue/cost model.
27 28 29 30	Pag:	8.2	Is it correct that the proposed (energy-based) rates for EV DCFC service to be paid by EV drivers are reduced by FBC's revenue from carbon credits (on a ten-year levelized basis)? If not, please explain why not.
31	<u>kesp</u>	onse:	

#### Response:

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As part of the calculation of the proposed 10-year levelized energy-based rate, FBC has included a forecast of annual carbon credits into the cost-of-service model for the period from 2024 to 2033. The levelized energy-based rate of \$0.39 per kWh therefore already includes a reduction in the rate due to forecast carbon credit revenue, as the forecast revenue from the carbon credits helps to offset the cost of service within the levelized rate calculation.



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- The <u>actual</u> revenue received from FBC's monetization of the carbon credits does <u>not</u> further reduce the EV charging rates paid by EV customers.
- The variances between the actual carbon credit revenue and the forecasts built into the proposed energy-based rate will be captured in the Flow-through deferral account. These variances, which could be credits or debits depending on whether the actual carbon credit revenue is more or less than the forecast included in the energy-based rate cost of service calculation, will be captured in the Flow-through deferral account and will be amortized into the rates of FBC's other customers.

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

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#### Response:

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



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Regulation.

### FortisBC Inc. (FBC or the Company) le (EV) Direct Current Fast Charge (DCFC) Energy-Based Rate

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

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1	9.0	Topic	:	GST and PST
2 3 4			1	Reference: Exhibit B-24 in the 2022-2021 proceeding regarding FBC's Rate Design and Rates for Electric Vehicle Direct Current Fast Charging Service Application
5 6 7 8		related FBC s	d to addir	ptember 24, 2021, FBC notified the BCUC of an administrative oversighting GST to the charges in Rate Schedule 96 for EV fast-charging service. vas working with its EV charging vendor to implement a resolution by 2021.
9 10 11		9.1		rity, please confirm that the proposed \$0.42/kWh rate for EV DCFC service of include GST or PST.
12	Respo	onse:		
13	FBC o	onfirms	that the	proposed rate does not include GST or PST.
14 15				
16 17 18 19 20 21	Respo	9.2 onse:	charges	confirm, or otherwise explain, that GST is being correctly added to the s in Rate Schedule 96 for EV fast-charging service and that this will remain e with the proposed energy-based rates.
22 23 24 25	added 96. Ho	to the o	calculatio GST is a	part of the cost-of-service of FBC's EV DCFC service, and it is not being on of the existing time-based rate or the proposed energy-based rate in RS added in the bill to the customer. This is consistent with FBC's other rate is not part of FBC's rates but is added based on the total billed amount).
26 27				
28 29 30 31		9.3		explain whether, and why or why not, PST is applicable to the charges in chedule 96 for EV fast-charging service.
32	Respo	onse:		
33	PST is	s not ap	plicable t	to the charges in RS 96 for EV fast-charging service, nor is it applied to the

rates customers pay when charging. As of April 1, 2019, electricity was made fully exempt from

PST as per the Provincial Sales Tax Act and the Provincial Sales Tax Exemption and Refund



# FortisBC Inc. (FBC or the Company) FBC Electric Vehicle (EV) Direct Current Fast Charge (DCFC) Energy-Based Rate Application (Application)

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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 4		On page 33, Table 3-7 shows Avg. Residential <u>Bill Impact</u> of \$0.28 per year under the Low Growth Scenario. [pdf p.37, underline added]						
5	On page 37 of the Application, FBC states:							
6 7 8			"The potential <u>rate impact</u> for the average residential customer is approximately 28 cents per year over the 10-year period from 2024 to 2033 if a low EV growth environment materializes." [pdf p.41, underline added]					
9 10		10.1	Should the statement on page 37 read "bill impact"?					
11	Respo	onse:						
12	Confir	med. Th	ne statement on page 37 of the Application should read "bill impact".					



# FortisBC Inc. (FBC or the Company) FBC Electric Vehicle (EV) Direct Current Fast Charge (DCFC) Energy-Based Rate Application (Application)

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

1	11.0	Topic	: Idling Charge
2			Reference: Exhibit B-1, p.14, lines 3-5, 7-10; p.18, lines 34-35; Section 3.4 Proposed Idling Charge, p.33, lines 3-23
4		On pa	ge 14 of the Application, FBC states:
5 6 7			"With the adoption of energy-based rates, most EV DCFC service providers are also introducing Idling Charges to encourage customers to move-on once charged in order to discourage unnecessary congestion at charging stations
8 9 10 11 12			FBC has proposed an Idling Charge of \$0.40 per minute which is comparable to most other service providers' Idling Charges, with the approach of including a grace period (i.e., if the vehicle is moved after 5 or 10 minutes after the end of charging) being generally consistent with other service providers, including Tesla." [pdf p.18, underline added]
13		On pa	ge 18 of the Application, FBC states:
14 15			"This section also includes FBC's proposed <u>Idling Charge to prevent unnecessary congestion at its stations</u> ." [pdf p.22, underline added]
16		On pa	ge 33 of the Application, FBC states:
17 18 19 20 21			"FBC has not received any complaints to date about idling or congestion at its EV DCFC stations; however, FBC expects the issue of congestion is likely to arise in the near future with the increase in EV sales and as the utilization of FBC's stations continues to grow, especially at high traffic stations such as the Kelowna Museum and Princeton.
22 23 24 25 26			Currently, FLO has indicated that their system is not capable of accommodating both an energy based rate and a time-based Idling Charge. FLO has communicated to FBC that upgrading their system to accommodate an Idling Charge is part of their development plan but not expected to be implemented until late 2024." [pdf p.37, underline added]
27 28 29 30		11.1	Please confirm, or otherwise explain, that the purpose of the proposed Idling Charge is to encourage customers to move-on once charged in order to discourage unnecessary congestion at charging stations.
31	Respo	onse:	
32	Confir	med.	
33 34			



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

#### Response:

Please refer to the response to BCUC IR1 9.2.

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

#### Response:

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



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

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12.0	Topic:	Reporting
		Reference: Exhibit B-1, p.36, lines 2-5
	On pag	ge 36 of the Application, FBC states:
		"Currently, FBC has been providing annual updates to its RS 96 EV DCFC service as part of FBC's annual review process, including discussions on utilization in terms of charging minutes, revenue, carbon credits, and O&M and capital expenditure forecasts. FBC proposes to continue this reporting in its rate setting proceedings." [pdf p.41]
	12.1	Please discuss whether, and if so how, FBC's proposal to continue providing annual updates to its RS 96 EV DCFC service in its rate setting proceedings is affected by the fact that FBC's 2020-2024 Multi-Year Ratemaking Plan will be succeeded by a new ratemaking framework that has not yet been proposed or approved.
Respo	nse:	
R	espo	<u>lesponse:</u>

As discussed on page 36 of the Application and referenced in the preamble, FBC proposes to provide updates to its RS 96 EV DCFC services in its rate-setting proceedings. These proceedings could be in the form of annual reviews as part of a new multi-year rate plan, or they could be through cost-of-service type revenue requirement applications, which may not be filed on an annual basis.

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## 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

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

1	13.0	Topic	: L	like-for-like replacement of EV chargers			
2 3 4			(	Reference: Exhibit B-1, section 3.2.1.4, Capital Expenditures and Contributions, pdf 28; section 3.3.2.2, Utilization Between 50 kW and 00 kW EV DCFC Stations, pdf 35			
5		On pa	ge 24 of t	he Application, FBC states:			
6 7 8 9 10 11 12 13		"As part of the forecast cost of service from 2024 to 2033, FBC has included estimate of \$25 thousand in 2023 dollars plus annual inflation for fut sustainment capital expenditures within the evaluation period, as minor repairs parts replacement such as power electronics or charging connectors/cables expected to occur from time to time. Furthermore, given the expected 10-yes service life of the EV chargers, FBC included future like-for-like replacement co at the end of the 10-year expected service life of each charger, estimated bas on the costs of the EV chargers in today's dollars escalated annually by the inflat assumption discussed in Section 3.2.1.6." [pdf p.28, underline added]					
15		On page 31 of the Application, FBC states:					
16 17 18 19 20 21			to prome custome than prid is likely stations	utilization information demonstrates that the price differential did not help to the more utilization of the lower power level stations. EV charging the ers are choosing the higher powered EV DCFC stations for reasons other toe, such as the duration of charging time over the price differential, and it that the 50 kW stations are typically used at times when the 100 kW are occupied, or the EV is limited by the charging speed depending on the odel of the vehicle" [pdf p.35, underline added]			
23 24 25		13.1	chargers	of FBC's observation that EV charging customers are choosing the 100 kW so over the 50 kW chargers, has FBC considered replacing its 50 kW so with 100 kW chargers when the 50 kW chargers are due to be replaced?			
26			13.1.1	If not, why not?			
27 28 29 30			13.1.2	How much extra would it cost to replace 50 kW chargers with 100 kW chargers when the 50 kW chargers are due to be replaced? What would be the impact on the levelized EV DCFC rates?			
31	Resno	onse:					

- Concurrently with these IR responses, FBC has filed an Evidentiary Update to the Application which updates FBC's proposed energy-based rate from \$0.42 per kWh to \$0.39 per kWh. FBC is responding to this information request based on the updated proposed energy-based rate from the Evidentiary Update.
- FBC currently does not have plans to replace its 50 kW stations with 100 kW stations or stations 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
- 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.

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.



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1	14.0	Topic	: Level 2 Charging Stations		
2			Reference: Exhibit B-1, BCUC Proceeding Regarding BC Hydro Application for Public EV Charging Rates		
4 5	BC Hydro plans to deploy Level 2 charging stations as a component of its public EV charging service.				
6 7 8 9	Resp	14.1 onse:	Is FBC considering, or will FBC consider, deploying Level 2 charging stations as a component of its public EV charging service? Please explain why or why not.		
10 11 12 13 14	its pul Level FBC c and c	olic EV 2 charg continue ould co	arrently planning the deployment of any Level 2 charging stations as a component of charging services. FBC believes there will continue to be third-party deployment of ging given the lower costs and reduced electric infrastructure requirement. However, es to monitor third-party deployment of Level 2 charging stations in its service territory ensider deployment if there is a lack of public Level 2 charging infrastructure that rived with DCFC stations.		



# FortisBC Inc. (FBC or the Company) FBC Electric Vehicle (EV) Direct Current Fast Charge (DCFC) Energy-Based Rate Application (Application)

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1	15.0	Topic	Forecast of Electricity Consumption			
2 3 4			Reference: Exhibit B-1, section 3.2.1.2, Station Utilization Forecast, p.19, pdf p.23; section 3.2.1.3 Electric Consumption and Cost of Electricity Forecast, p.21, pdf p.25			
5 6 7 8		FBC states that its forecasts of EV DCFC station utilization and the resulting amounts or electricity dispensed are based on historical usage rates escalated by the growth rates of EV sales in FBC's service territory, with a direct correlation assumed between charging minutes and kWh of dispensed electricity. [pdf pp.23-25]				
9 10 11 12		15.1	What is FBC's estimate of the ratio of EV DCFC station utilization and dispensed electricity attributable to local EV drivers and to EV drivers passing through FBC's service territory?			
13	Resp	onse:				
14 15	FBC does not have the ability to track whether customers are local or non-local EV drivers and therefore cannot determine the estimated ratio of local to non-local EV drivers to date.					
16 17						
18 19 20 21		15.2	Are there any indications that this ratio may change during the ten-year levelization period?			
22	Resp	onse:				
23	Please refer to the response to BCSEA-VEVA IR1 15.1.					
24 25						
26 27 28 29 30		15.3	Please comment on whether the estimates of utilization rates and electricity consumption during the ten-year levelization period would be materially affected by expressly considering the possibility of a change in the proportion of non-local EV drivers using FBC's DCFC system.			
32	Resp	onse:				
33 34			information regarding the current proportion of non-local EV drivers using FBC's n or reason to expect a material change in the proportion of non-local EV drivers			

using FBC's DCFC system, or that such a change could have a material impact to the estimated

utilization rates and electricity consumption during the 10-year levelization period.