

To whom it may concern,

As transportation goes through a paradigm shift toward electrification there are greater public and political pressures to ensure there is sufficient, cost effective and equitable access to public EV charging infrastructure. As an owner and operator of a large public facing DC fast electric vehicle (“EV”) charging network across Ontario and Quebec we are at the forefront of investing in the infrastructure to support the nascent EV industry. The significant investment we are making is high risk as there are a very small number of EVs on the road using our EV charging infrastructure and there is substantial uncertainty regarding how the market will develop and evolve over time. Obviously, electricity costs are of the utmost importance to our business and the application of demand charges has a very significant impact on our ability to continue to navigate in this emerging market. We are very supportive of the Ontario Energy Board’s (“OEB”) work to manage the implications of demand charges associated with EV charging and we have a lot of experience to contribute to ensure the OEB fully understands the reality on the ground in making its decisions.

Based on our experiences, it is clear there is a need for regulatory evolution to support the adoption of EVs. Power Advisory identified that there are two unique market segments that are impacted by demand chargers, fleet charging (“**Fleet Charging**”) and public facing DC fast charging (“**PFDC Fast Charging**”). Given the individual characteristics of each segment we are supportive of a unique rate design solution to address the barriers faced by **PFDC Fast Charging** and a separate and unique rate design solution for **Fleet Charging**.

The OEB should be commended for their work to implement consumer choice over the past few years with the introduction of time-of-use and opt-in rates for customers, such as the recent ultra-low overnight rate to address residential EV charging. **PFDC Fast Charging** should be able to benefit from a rate design that provides for: (a) similar financial support as residential EV charging has received; and (b) a choice of rate structures that best match continuing changes in utilization.

A discounted opt-in/out low load factor rate class for **PFDC Fast Charging** will provide charging owners and operators the ability to withstand low utilization over the short term. As utilization increases, **PFDC Fast Charging** should be subject to a graduated low load factor rate that is tailored towards their specific load factor. Once the **PFDC Fast Charging** load factor reaches a specified amount over a specified number of months and is more in-line with a traditional load customer, the **PFDC Fast Charging** customer should be able to opt-out of the low load factor rate class and opt-in to another existing better suited rate class. This discounted opt-in/out low load factor rate class should be available for **PFDC Fast Charging** across all LDCs to also ensure that there are no unintended location-based disincentives to EV adoption.

Finally, as we have found in Quebec, load customers who wish to opt-in to an EV charging rate class should be required to have an independent meter that monitors the EV charging stations and supporting station service and ancillary loads. This opt-in EV charging rate class should be made available to customers who are on a sub-meter with a licensed sub-meter provider.

As previously stated, we commend the OEB on their work to evolve the rate structures offered to Ontarians related to EV charging. We encourage the OEB to continue their stakeholder engagement as the EV rate design will need to continue to evolve and be implemented into the Ontario market.