

**From:** bem.case@ttc.ca <bem.case@ttc.ca>

**Subject:** Feedback on electricity rates for EV fleets (Ref EB-2023-0071)

To the OEB team,

Once again, thank you for inviting the Toronto Transit Commission to participate in the subject review. As mentioned briefly at the stakeholder engagement on May 24<sup>th</sup> and then in a bit more detail at yesterday's call, below are areas of I recommend following up on (in no particular order):

- Concern that the alternative rate that used a time-varying demand charge may not support transit electrification where a typical eBus garage is expected to have a large afternoon peak.
- Concern that a transit authority being subject to a time-varying demand charge may be negatively impacted if the rate applies to all facilities (including whole facility load at bus garages, streetcars, and subways).
- Concern that fleet owners being subject to time-varying demand charge may be negatively impacted once facility heating is transitioned to electric boilers, heat pumps, etc.
- Observation that service profiles may shift as rider preferences shift, which change transit authority requirements constraining response to rates.
- Concern that a temporary program would not provide the certainty required to justify investment in things like energy storage.
- Interest in a public transit rate in recognition of the benefits that bus electrification delivers – demonstrate to heavy duty and therefor all other fleet owners that its possible, local air quality and reduced noise pollution in densely populated areas, etc.
- Interest in rates that appropriately incentivize shifts in customer behaviour or investments in technologies that shift load to reduce costs to the distribution system.

If the overnight rate is low enough and the rates are fixed for the life of capital assets required to shift daytime electric demand to the night, many of these concerns can be addressed. However, I think it will be important to ensure that the rate structure doesn't introduce unintended negative impacts, such as charging more for daytime use of electricity to move electrified rail systems.

I would be happy to follow-up with discussion on potential models that advance the mutual goals of all levels of government to support public transit through this energy transition. Further, if you would like any data for running scenario analysis, I would be happy to facilitate by providing TTC data directly or gathering data through the OPTA ZEB Committee.

If you're interested in a follow-up, the best way to get me is by texting [REDACTED] and/or emailing me with copy to [adriana.ruiz@ttc.ca](mailto:adriana.ruiz@ttc.ca).

Thanks, Bem

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