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Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, ON
M4P 1E4

Attn: Nancy Marconi, Registrar

Submitted electronically.

RE: EB-2019-0207
Notice of Proposal to Amend DSC - EVCCP Electric Vehicle Charging Connection Procedures

Tesla is pleased to offer our feedback on the Ontario Energy Board's (OEB) Proposed Amendments to the Distribution System Code (DSC) related to the Electric Vehicle Charging Connection Process.

Tesla is a manufacturer of electric vehicles, energy storage equipment, EV charging equipment, and is also a charging network owner and operator. Tesla currently owns and operates 63 public DCFC sites in Ontario with a total of 643 chargers with power levels up to 250 kW per charger. Tesla's mission is to accelerate the transition to sustainable energy through the development of all-electric vehicles and clean energy products, including photovoltaic solar and battery storage. Tesla's vehicle line-up includes the Model S sedan, Model X crossover vehicle, Model 3 sedan, Model Y crossover vehicle, and the Cybertruck. The vehicles have an all-electric range of up to 652 km per charge (Model S), and industry-leading performance and safety ratings. In 2023, Tesla delivered more than 1.8 million vehicles globally[1] and in December 2022, delivered its all-electric Class 8 Semi trucks to the first customer. Worldwide Tesla owns and operates an extensive Supercharger network of public DCFCs with over 50,000 Supercharger connectors deployed globally.[2]

Electric vehicle (EV) market share is growing exponentially, and publicly accessible charging deployment needs to keep pace with that growth. There are a few challenges that can lead to charging infrastructure being outpaced, and one frequent challenge across jurisdictions is complex distributor connection processes. This is particularly important for EV Direct Current Fast Charging (DCFC) stations, which typically require a large new electrical service and

[1] https://ir.tesla.com/press-release/tesla-vehicle-production-deliveries-and-date-financial-results-webcast-fourth-quarter-2023
[2]https://www.tesla.com/supercharger#:~:text=With%2050%2C000%2B%20Superchargers%2C%20Tesla%20owns,you're%20away%20from%20home.

additional electrical equipment but has a much smaller overall development size and significantly reduced project timeline when compared to other infrastructure projects with a similar capacity requirement. DC-Fast stations can be deployed in a matter of weeks. For this reason, DCFCs should be treated differently from mini malls or big box stores that have a similar capacity requirement but longer project development timelines. Importantly, streamlined and EV specific distributor connection processes accelerate deployment of EV chargers and ultimately encourage EV purchases. Further, EV charging station build-out expands economic development and helps meet provincial and federal policy objectives.

In recognizing the importance of these challenges, Tesla was pleased that the OEB established the EV Integration Initiative to identify high-level issues related to connecting non-residential EV chargers, in particular public charging stations for charging multiple EVs and fleet charging installations, including:

- the need for improved consistency among distributors in terms of connection processes, including timelines, responsibilities, offers to connect and costs
- establishing detailed timelines for the connection process to ensure the timelines and responsibilities are well understood
- further standardizing a consistent and transparent connection process in enabling non-residential EV chargers
- the need for mandatory requirements for the connection process, to provide greater certainty that the process improvements would be implemented across the province

Tesla participated regularly in this effort through the OEB EV Subgroup meetings, and Working Group meetings, with the goal to improve transparency, consistency and efficiency of EV charging connections and standardization of the connection process.

Several approaches were discussed to resolve these issues in the working groups, but generally, Tesla supports the OEB's proposed amendments to the DSC that will, among other matters, require licensed electricity distributors to comply with the OEB's Electric Vehicle Charging Connection Procedures (EVCCP). We believe that the EVCCP standardizes many of the key elements of the connection process and requirements, including timelines, information exchange, and responsibilities of both distributors and customers pursuing the connection of DCFC charging stations.

Tesla appreciates that the EVCCP is to be a stand-alone process document that provides clarity across *all distributors and their customers seeking to connect EVSE*. Importantly, it also ensures distributors comply with regulatory requirements as set out in the DSC and EVCCP.

The key elements of the EVCCP that Tesla believes will help to improve the connection process for EV charging infrastructure, includes:

- procedures and information requirements that are consistent and apply across all distributors;

- a preliminary consultation process and form that provides an EVSE customer with an option to request information from a distributor that includes high-level connection feasibility information, prior to making a request for connection;
- process flow charts that include specific steps tailored for EVSE connections, that help parties in understanding the linkages between process steps, and that provide clarity and delineation of the responsibilities of distributors and customers;
- clear timelines that reinforce distributor responsibilities;
- standardized OTC and Cost Summary related to EVSE connections, including a standardized list and detailed explanations of the information that must be included, like a comprehensive Cost Summary detailing costs and charges related to the connection;
- DSC amendments that will make compliance with the EVCCP mandatory for licensed electricity distributors.

Tesla recognizes that there may still be some distributor-specific requirements related to the connection of EVSE, and appreciates that these differences will now be outlined in a separate appendix in the distributors Conditions of Service (CoS) document. This will help to consolidate distributor-specific EVSE connection information into a single resource for customers seeking to connect in their service territory.

Tesla expects that this standardized approach across LDCs will enhance clarity and transparency in the process, aiding EV charging customers in understanding the costs and responsibilities associated with their connections.

With that said, Tesla believes there are two additional issues that should be addressed in the near future to improve the connection of EV charging infrastructure through the EVCCP and related amendments:

- Distributors should be encouraged to provide anticipated equipment/supply chain lead times if known/available. While LDCs should ideally maintain adequate supply of transformers and common upgrade equipment, if this is not possible, they should be encouraged to track and communicate timelines that may impact distributor connection work.
- Distributors should be required to publish up-to-date and dynamic utility distribution and capacity maps. Capacity maps and information are an incredibly important tool for all customers, but especially for EV charging companies at a time when the electrification of transportation is expected to continue accelerating at an incredible pace. Several other jurisdictions around North America and Canada (for example: Fortis AB, Manitoba Hydro and AESO), have already recognized the value that transparent data and visualization of connection capacity can provide. Without publicly available information, the only way for customers to know where to site new EV charging connections is by directly submitting a connection request to the LDC, and now through the Preliminary Consultation option in the EVCCP. The volume of these requests could

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be avoided in the future if capacity information and dynamic data was publicly available.

Tesla would like to emphasize that up-to-date publicly available dynamic data and capacity information is not simply an EV charging company issue as this will also have broader benefits to all customer types. At a time when electrification will only continue to grow and distributed energy resources proliferate, publicly available information is becoming more important, and should be considered standard in Ontario, as it has been trending in other jurisdictions. We also recognize that this is an item the OEB will be seeking to explore further through the EV Subgroup, which Tesla supports.

Overall, Tesla would like to emphasize that it appreciates the efforts of the OEB and its staff to seek an improved EV charging connection process in Ontario. Tesla believes that the proposed amendments are likely to have a positive impact in supporting the anticipated growth of electrified transportation in Ontario.

Yours sincerely,

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