

BY EMAIL and RESS

June 27, 2024

Ms. Nancy Marconi
Registrar
Ontario Energy Board
2300 Yonge Street, 27th Floor
Toronto, Ontario
M4P 1E4

Dear Ms. Marconi:

**EB-2023-0071 Electricity Delivery Rates for Electric Vehicle (EV) Charging Stations-
Building Owners and Managers Association (BOMA) Comments**

In its May 1, 2024 letter, the Ontario Energy Board (OEB) invited stakeholders to a meeting on June 13, 2024, to discuss a proposal for an electricity delivery rate for public EV charging stations that have a low load factor. The OEB also invited written comments on this proposal from stakeholders.

Please find attached BOMA's comments on the above referenced matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Clement Li".

Clement Li

Director, Policy & Regulatory Development
Enerlife Consulting Inc.
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EB-2023-0071 Electricity Delivery Rates for Electric Vehicle (EV) Charging Stations

Building Owners and Managers Association Comments

Introduction

The Building Owners and Managers Association (BOMA) represents over 800 Ontario Property and Facility Owners, Managers, Developers, Leasing Agents, and Commercial Real Estate Professionals. Its members account for 80 per cent of all commercial and industrial real estate companies throughout Ontario. Over the years, BOMA has been active in protecting and advancing the interests of its members on important policy issues including energy transition, energy pricing and supply, property taxes, labour requirements, building materials and equipment regulations.

BOMA believes the Ontario Energy Board's (OEB) Electric Vehicle Integration (EVI) initiative will help enable the efficient integration of EVs with the electricity system, reducing greenhouse gas emissions that contribute to global warming and climate change. BOMA is generally supportive of the OEB's EVI initiative and will continue to provide a voice for commercial property owners and operators in Ontario throughout the development of this important initiative.

General Comments

An open, collaborative and integrated approach is key to success

OPENNESS - A broad consultation process that facilitates collaboration and discussion among parties is key to a positive outcome and as such, BOMA supports the OEB's efforts to solicit stakeholder input for considering rate design options for low load factor EV charging facilities (EVC Rate).

COLLABORATION - EV adoption is just beginning, and we will see transformative changes in many aspects of the electricity system, including government policy, market demand, economic factors and technology. Navigating these uncertainties will require coordination and collaboration among different levels of government, regulators, electric utilities, owner groups and industry.

INTEGRATION - In the near future, vehicle-to-grid¹ (V2G) enabled EVs can act as Distributed Energy Resources (DER), providing additional capacity (e.g. Demand

¹ V2G: A smart charging technology that enables EV batteries to provide electricity back to the power grid

response) to support and provide benefits to the smart electricity grid. EV technology is just one of the many key components in a future smart grid. It is therefore important to manage EV adoption with an integrated and holistic approach right from the start (with other smart grid components). In addition, the future full benefits of EVs need to be communicated and promoted from the outset to attract commercial landlords' interests and participation.

Responses to OEB Staff Questions

1. *Should charging stations be required to provide service to all EV models to be eligible for the EVC Rate? Would it be feasible for charging stations to provide universal service? How would it be accomplished?*

This should not be a requirement (to provide service to all EV models or to provide universal service) as more flexibility will lead to higher participation. Moreover, enforcement and verification will impose additional burden on local distribution companies (LDC) and increase costs.

2. *EVC Rate design options:*
 - a. *What are your thoughts on the three EVC Rate design options (A, B and C)?*
 - b. *Which option would you recommend and why?*
 - c. *How strong is your preference?•Do you have any other advice on what to consider when choosing the EVC Rate design option?*

BOMA recommends option A (single tier). Rates should be simple to understand and implement. Although Options B and C reflect the relationship between coincident peak contribution and load factor closely, it is too difficult/complicated to understand and implement. No other customer class has sliding scale distribution or transmission rates.

3. *What do you think of the voluntary opt-in nature of the proposed EVC Rate? Should there be a limit on how frequently a participant may opt in and out of the EVC Rate?*

It is BOMA's understanding that OEB staff proposes the opt-in approach because distributors might not otherwise have visibility on the end-use of the customer in order to assess eligibility. BOMA supports this rationale.

There should be a limit on how frequently a participant may opt in and out of the EVC rate to reduce administrative burden on LDCs and costs. It is expected that

charging stations' load factors would not change suddenly and therefore a low opt-in/out frequency is recommended (e.g. not more than once a year).

4. *Do you have any advice on measuring demand for purposes of this EVC Rate? Do you have any advice on assessing a participant's ongoing eligibility for the EVC Rate?*

Measuring demand for purposes of the EVC rate should be the same as the current RTSR rate for the rate class, for simple implementation, least cost.

It is expected that charging stations' load factors would not change suddenly and therefore a low frequency (e.g. annual) eligibility assessment is recommended.

5. *What do you think of the proposed approach in which distributors would apply their existing procedures for dealing with participants whose monthly load factors occasionally exceed 15%?*

LDCs should apply similar procedures such as demand monitoring process (e.g. 50kW and other demand thresholds) for rate classification purposes. A small number of occurrences per year (i.e. deadband) should be allowed to minimize unnecessary customer rate changes and LDC administrative burden.

6. *Is the set of eligible auxiliary loads identified in the discussion paper appropriate? Are there others that you'd recommend?*

The set of eligible auxiliary loads identified in the May 30, 2024 OEB Staff discussion paper appears to be appropriate. BOMA expects this would attract many questions and clarifications from customers and therefore recommends a Q&A section on this matter (including further descriptions) posted on the OEB's and the LDC's websites. Enforcement and verification will be a challenge for LDCs. There should be an on-going mandated self declaration requirement for all opt-in customers.

7. *Should stations that have some or no DCFC chargers be eligible for the EVC Rate? Should a limit be prescribed on the share of charging station load that may come from other types of EV chargers that are not DCFC chargers? If so, what should that limit be?*

Stations that have some or no DCFC chargers should be eligible for the EVC rate as more flexibility will lead to higher participation. Moreover, enforcement and verification will impose additional burden on LDCs and increase costs.

8. *What do you think of this approach of self-declaring eligibility for the EVC Rate?*

BOMA agrees with the OEB staff proposal (i.e. The attestation would confirm that, over the next 12 months, the charging station demand is expected to be between 50 kW and 4,999 kW, the station will be publicly accessible, the station will have a load factor of 15% or lower, and the station will be separately metered.). Enforcement and verification will be a challenge for LDCs. There should be an on-going mandated self declaration requirement for all opt-in customers.

9. *Is it appropriate that the attestation should come from a “representative” of the customer, or should something more specific be required? For example, should the attestation be signed by someone like a professional engineer?*

The attestation should come from the owner (or someone assigned by the owner) of the charging facility. Requiring a professional engineer to sign the attestation would add unnecessary cost to the owner and would not ensure compliance. LDCs should be required to periodically review the ongoing eligibility of participating EVC Rate customers.

10. *Do you agree with the proposed approach of not establishing new rate classes for participating EV charging stations upon implementation of the EVC Rate?*

Yes. Establishing new rate classes will increase LDC’s administrative burden and costs.

11. *What do you think of the approach of starting out with the RTSR reduction parameter issued by the OEB initially, but allowing the opportunity for distributors to propose more territory-specific EVC Rates in the future if they wish?*

BOMA agrees with the OEB staff proposal (i.e. The OEB would establish a general, provincewide EVC Rate parameter for implementation by 2026. Distributors would use the parameter to calculate their RTSRs for participating public EV charging stations. As distributors gain more experience with public EV charging stations, they may wish to propose EVC Rate parameters specifically tailored to their own service territories.). Starting with a provincewide EVC Rate established by the OEB is the most administratively efficient option.

12. Does the potential distribution-specific customization of the EVC Rate in the future influence or change your thoughts on which EVC Rate design option (A, B or C) should be selected for now? For example, is one EVC Rate design option likely to be more amenable to customization than another?

No. BOMA continues to recommend option A (single tier). Rates should be simple to understand and implement. LDCs should consider this rate making principle if and when they decide to propose any specific customization to their EVC rate in future cost of service applications.