

Submission to OEB re: revised EVC Rate

CC: Ministry of Energy and Electrification

We, the undersigned, strongly support the OEB's proposed Electric Vehicle Charging (EVC) rate. Our collective expertise spans the EV ecosystem, encompassing technology manufacturers, charging infrastructure providers, owners, operators, and customers. Despite our diverse perspectives, we endorse the OEB's strategic direction, which has been thoughtfully developed under the Ministry of Energy and Electrification's guidance, on a revised EVC rate. In making these important changes, the EVC rate will improve the business case for investing in EV charging infrastructure – and this will meaningfully support a more robust public charging network in Ontario. We would also like to reiterate that the established timelines for the availability of the EVC rate be maintained. This provides owners and operators of EVSE market certainty on their investments and appropriately aligns with the timing of LDCs' 2026 OEB-approved rates.

Revised EVC Rate and specific areas of support:

- **Rate Option 2a:** Our endorsement of the OEB's proposed Electric Vehicle Charging (EVC) rate centers on the OEB's preference for Option 2a. While not necessarily the preferred choice of all the undersigned, Option 2a balances much needed cost relief with administrative simplicity.
- **20% Load Factor:** We support the proposed increase in load factor cutoff from 15% to 20% provides significant strategic advantages. It enhances financial predictability for infrastructure investors, reflects evolving charging network efficiency, enables more strategic infrastructure planning, and accounts for sporadic higher-utilization periods.
- **The escalated RTSR rate,** to account for the increased load-factor, is appropriate.
- **We support the OEB's proposal for no sunset date and a review after 5 years.** This approach offers critical long-term investment certainty.
- **Load Factor Calculations:** We support the proposal for an annual load factor calculation. This will support dynamic performance assessment and adaptability, particularly for charging locations in tourist or seasonally utilized areas.

Operationally, the proposal demonstrates a nuanced understanding of EV charging infrastructure complexities. The 10% auxiliary load limit and AC charging inclusion recognize the technical intricacies of charging infrastructure, particularly the often-necessary co-location of DC fast chargers and Level 2 chargers to provide consumers with diverse charging options based on varying dwell times, state of charge, and individual needs. Not prescribing separate metering requirements and a lack of all-EV model

servicing requirements will reduce administrative burdens for LDCs while maintaining network integrity.

To ensure successful implementation, we propose a comprehensive stakeholder communication plan that provides detailed guidance to charging station owners and operators, ensures clear and accessible information about the new rate structure, facilitates a smooth transition, maximizes industry understanding, and includes targeted outreach to various ecosystem participants.

When the OEB determines the time is appropriate, we would consider fleets to be a major priority for a similar rate option in the future. This could have a substantial impact on medium and heavy-duty ZEV adoption in the early deployment stages, during which load factors for charging stations are likely to be very low.

We wish to reiterate our support of the EVC rate. Companies like SWITCH, Tesla, FLO, and ChargePoint remain committed to ongoing dialogue with the OEB throughout the Electric Vehicle Integration initiative, recognizing the rapidly evolving nature of EV charging technology. We look forward to collaborating with the OEB, LDCs, and broader stakeholder community to develop a reliable, province-wide charging network that supports Ontario's electrification goals.

Sincerely,

Mike Frisina
Director, Policy
SWTCH Energy, Inc

Suzanne Goldberg
Senior Director, Public Policy - Global
ChargePoint Canada Inc

Audrey Dépault
Managing Policy Advisor
Tesla Motors Canada ULC

Frédérique Bouchard
Senior Public Affairs Manager
FLO