

# Elson Advocacy

January 31, 2025

**BY RESS**

**Nancy Marconi**

Registrar

Ontario Energy Board

2300 Yonge Street, Suite 2700, P.O. Box 2319

Toronto, Ontario M4P 1E4

Dear Ms. Marconi:

**Re: EB-2023-0071 – Electric Vehicle Integration (EVI)  
Electric Delivery Rates for Electric Vehicle (EV) Charging Report and  
Invitation to Stakeholder Meeting**

I am writing on behalf of Environmental Defence to provide written comments on the Electric Vehicle Charging Rate proposals released by the OEB on January 7, 2025. Environmental Defence strongly supports this initiative. It is responsive to directions from the Minister of Energy to “consider distribution rates for EV charging”<sup>1</sup> and recognises the economic imperative to facilitate electric vehicle (“EV”) charging expansion in Ontario, lest we get left behind as other more favourable jurisdictions surge ahead of us.

The OEB’s proposal is an excellent step forward to facilitate the expansion of EV charging in Ontario. The Companion Report is very well reasoned and carefully describes how stakeholder comments were considered. The latest proposal includes significant improvements that balance the various considerations. Although Environmental Defence would prefer more ambitious support for EV charging, the final proposals are certainly very positive.

When considering measures to facilitate the expansion of EV infrastructure, it is important to recognise that EVs represent an important opportunity to reduce distribution charges by increasing the load factor. Synapse Energy Economics has studied this effect in California. It concluded that “EV drivers in PG&E’s, SCE’s, and SDG&E’s service territories have contributed approximately \$1.7 billion more in revenues than associated costs, driving rates down for all customers.”<sup>2</sup> EVs should be treated as an opportunity to be capitalized on.

Environmental Defence strongly encourages the OEB to take further steps to facilitate integration of EV charging infrastructure, including the creation of rates for fleet charging and reductions in connection costs for EV chargers. Additional work on this important topic would be consistent with directions that the Ministry has provided the OEB and with the Ontario Government’s strong support for EVs as a driver of jobs and economic development. It is also

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<sup>1</sup> Letter of Direction from the Minister of Energy, October 21, 2022 p. 3.

<sup>2</sup> Synapse Energy Economics, *Electric Vehicles Are Driving Electric Rates Down*, October 2022 ([link](#)).

consistent with the reality that EVs can lower distribution rates for all customers by increasing the load factor. Environmental Defence strongly supports all of the OEB's efforts to facilitate EV adoption, including these revisions to distribution charges to better support EV charging.

Yours truly,

A handwritten signature in blue ink, appearing to read 'K. Elson', with a stylized, cursive script.

Kent Elson