

BY EMAIL and RESS

January 31, 2025

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

Dear Ms. Marconi:

EB-2023-0071 Ontario Energy Board Electric Vehicle Charging Rate Overview - Draft Report - Building Owners and Managers Association Toronto ("BOMA") Comments

In its January 7, 2025 letter, the Ontario Energy Board (OEB) invites comments from stakeholders on a revised proposal for an Electric Vehicle Charging Rate (EVC Rate). The revised proposal incorporates feedback that the OEB received from stakeholders on the OEB's initial EVC Rate proposal, which was published for stakeholder comment in May 2024.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Clement Li", written in a cursive style.

Clement Li

Director, Policy & Regulatory Development
Enerlife Consulting Inc.
cli@enerlife.com

EB-2023-0071 OEB Electric Vehicle Charging Rate Overview – Draft Report**Building Owners and Managers Association Toronto Comments****Introduction**

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

General Comments

BOMA believes the Ontario Energy Board’s (OEB) Electric Vehicle Integration (EVI) initiative will help enable the efficient integration of Electric Vehicles (EV) with the electricity system, reducing greenhouse gas emissions that contribute to global warming and climate change. BOMA is supportive of the OEB’s EVI initiative. The revised EVC Rate Proposal is an important step to promote EV adoption in Ontario.

A broad consultation process that facilitates collaboration and discussion among parties is key to a positive outcome. As such, BOMA commends the OEB’s efforts to solicit broad stakeholder input for considering rate design options for low load factor EV charging facilities.

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

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

Specific Comments on the Revised EVC Rate Proposal

At least one DCFC Charger

BOMA supports the “at least one DCFC Charger” requirement. While it promotes DCFC charger, which is a more advanced and effective charging platform, it also promotes flexibility (allowing non-DCFC chargers), which will lead to higher participation.

Annual Load factor up to 20%

BOMA supports the proposed annual load factor calculation described in section 4.2 of the Draft Report. Customers are eligible even if their monthly load factors occasionally exceed 20%, which will minimize unnecessary customer rate changes and distributor administrative burden.

Not for Fleets

BOMA understands and accepts that Fleet charging stations can have very different load profiles (when compared to other public charging stations) and therefore are not eligible for the EVC rate. However, the decision to exclude EV fleet charging stations will decrease the incentive for companies to transition their fleets to EVs, resulting in less potential to reduce greenhouse gas emissions and to use EV fleet as V2G DERs to provide additional capacity to the smart electricity grid.

Separate Metering not required

BOMA supports removing the separate metering requirement as it will reduce costs, administrative burden and lead to higher participation.

No New Rate Classes, Option A and Provincewide EVC Rate Parameter

BOMA supports “No new rate classes”, the selection of Option A as the EVC rate and the use of a provincewide EVC rate parameter. These choices minimize implementation and on-going administration costs and effort, and they are easier to understand.

No Sunset Date for EVC Rate

BOMA expects that the EV technology and landscape will continue to evolve and therefore recommends a review of the EVC Rate within three to five years of implementation. The OEB needs to require electricity distributors to collect key information on EVC Rate participation to support the future rate review.