

**Honourable Navdeep Bains, Minister of Innovation, Science and Industry**  
**House of Commons**  
Ottawa, Ontario  
K1A 0A6

September 12, 2020

Dear Minister Bains:

In a submission on March 15, 2018 from the MEMPR to Mr. Patrick Ruck, Commission Secretary of BCUC, it is stated that

*"Until Measurement Canada approves meters that can base rates on electricity consumption, rates based on time appear to be an appropriate surrogate".*

To the contrary in our opinion, shared by many other EV drivers, this rate structure is totally inappropriate and unfair. Gasoline is charged on a per liter basis, not on time! Electricity should be charged on a kW hour basis as it always has been for home and industrial use.

On a recent trip from Kamloops to our home in Nanaimo, we needed to charge at Merritt in order to be able to reach the next BC Hydro charging station at Hope. This was due to problems with the charging station at Britton Creek. Since the Merritt Petrocan chargers were out of order and the only other fast charger there was occupied, we decided to charge at the newly installed Electrify Canada charging stations. The rate structure is time based as mandated by the government. The charger has the capability of delivering up to 150kW. Our Chevy Bolt has a maximum charge capacity of 50kW at below 50% of full battery capacity. After that the power drops in steps. So we were only able to receive 35 kW. After charging for almost 40 minutes we were billed for 12 kWh at \$11.24 - providing approximately 66km of range. If the rate structure was based on kW used at a reasonable rate of 27 cents per kWh the cost would have been \$3.24 plus tax. Charging at home (which we normally do) would have been \$1.68 based on 14 cents per kWh (BC tier 2 rate) - a factor of almost 7 times less.

We will avoid using these charging stations in future. However, if people face public charging pricing that is a factor of 6-7 times higher than home charging, and double to triple the cost of gasoline, they are unlikely to buy an EV. This rate structure discriminates against certain makes of EV's that cannot accept a high rate of charge - unlike Teslas, for example, that can accept a much higher rate. It also discriminates against Canadians who cannot charge their vehicles where they live and must use publicly available charging stations such as these. This creates an impediment to the uptake of EVs and flies in the face of government policy to support the increased use of ZEVs to reduce carbon emissions. It's time for the government to walk the talk.

Canadian EV owners can be charged over \$1 per kWh for charging at Level 2 AC and DC fast chargers because Measurement Canada **does not allow** EV charging by the kWh. This is shameful and needs to change. Nobody wants this condition - not suppliers, not OEMs and

certainly not consumers. Yet Measurement Canada seems incapable of mitigating this condition by allowing per kWh fees as is done in Europe and parts of the USA. We can see from the example of other countries that this is technically very feasible. There is no excuse for this taking so long. We understand the concern about accuracy but even if the kW measurement had a 10% error, the cost to consumers would be a significant order of magnitude lower than a time based charge. Time based charging is simply unacceptable.

The Government has acknowledged that there is a climate emergency and we are trying to get more EVs on the road. Why is the Government working against itself and us by not solving this long standing problem? We have been driving electric vehicles for over seven years and still this situation persists. California, Norway, the Netherlands, Germany and France have already solved this problem. Why haven't we? If the government is serious about addressing climate change we strongly suggest you address this issue without further delay. This should be a relatively easy and inexpensive fix and EV drivers will thank-you for it.

Respectfully, etc.

CC: Hon. Jonathan Wilkinson, Minister of the Environment  
Hon Marc Garneau, Minister of Transportation  
Paul Manly, MP Nanaimo  
Terry Beech, MP North Burnaby Seymour  
Mid Vancouver Island Electric Vehicle Association  
Vancouver Electric Vehicle Association  
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