



Cheryl Blundon
Director of Corporate Services and Board Secretary
Newfoundland and Labrador
Board of Commissioners of Public Utilities
120 Torbay Road, Suite E-210
St. John's, Newfoundland and Labrador, A1A 2G8

Via e-mail to cblundon@pub.nl.ca

July 12, 2023

RE: Newfoundland and Labrador Hydro - Application for the Construction and Installation of Ultra-Fast Electric Vehicle Charging Stations - 2023-07-05

Comment from Drive Electric NL

Good day Ms. Blundon,

I represent Drive Electric NL Inc, a registered not-for-profit EV advocacy organization in the province of Newfoundland and Labrador. With regard to the application noted above, Drive Electric NL is submitting the following comment.

Regulatory decisions made with respect to electric vehicle adoption, rates, and charging infrastructure will have significant effect for electric vehicle owners and future owners. With the Government of Canada's mandate to 100% EV sales by 2035, future owners effectively includes owners of all light and medium duty vehicles in the province.

We appreciate the opportunity for Drive Electric NL to provide comment for this application. Please do not hesitate to contact me directly with any questions.

Jon Seary
Drive Electric NL
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Drive Electric NL is a not-for profit, created to educate individuals and organizations in Newfoundland and Labrador on EV adoption and related benefits and opportunities.

DENL delivers in-person EV information programs to municipalities, hospitality, schools, first responders and fleet managers, and operates the Drive Electric Resource Centre, Drive Electric NL social media, and driveelectricnl.ca.

Newfoundland and Labrador Hydro - Application for the Construction and Installation of Ultra-Fast Electric Vehicle Charging Stations - 2023-07-05

July 12, 2023

Comment from Drive Electric NL

Drive Electric NL supports Newfoundland and Labrador Hydro's application for the construction and installation of ultra-fast electric vehicle charging stations.

While the existing 33 fast charging sites across Newfoundland and Labrador provide reasonable geographic coverage, electric vehicle owners and future owners frequently note a few concerns:

- Existing chargers are single units, only able to charge one vehicle at a time;
- Existing chargers are 62.5 KW, slower than many newer vehicle can accept.
- Key locations such as Whitbourne, Deer Lake and Goobies are fully dependent on the single unit.

The proposed ultrafast chargers go a long way towards addressing these concerns:

- When located at the sites outlined in the application, these chargers will reduce congestion that is starting to occur with more electric vehicle adoption occurring in the province.
- By implementing a faster charging option alongside the existing 62.5 KW chargers, EV owners will have the option to choose a charger that works for their needs and vehicle's charging capability.
- As electric vehicles with larger batteries and heavier power usage become common, such as the Ford Lightning electric truck, charge times at the ultrafast chargers are more manageable.
- These chargers will also provide redundancy at key sites in the event one charger is out of service at any point.

Specific to the application, we make a few recommendations:

1. Signage for both the new ultra fast chargers and existing chargers should be installed to identify charger capacity, such as pictured.
2. An effort to include the North American Charging Standard (NACS) connector as well as the CCS connector should be made. Allowances to retrofit NACS at a later date would also be acceptable.



3. An effort to standardize charger management software between the province's DC fast chargers is important. This software allows EV drivers to check status and reserve a charger a few minutes prior to arrival. Standardizing the platform allows drivers to view all chargers at once. If the manufacturer's software solution does not allow this functionality, then a third party option such as ChargeHub may make sense.

General recommendations for DC Fast Chargers

Drive Electric NL has a number of general recommendations for DC Fast Chargers and are happy to work with proponents to ensure good site selection and planning. It is understood that such details are not necessarily apparent to anyone who is not a frequent user of these chargers, and we seek to avoid situations that prove unsafe and costly to correct later. A few key points include:

- Users of DC Fast Chargers are typically visitors to the area. Many times they are travelling with families and children who will use the charging stop to exit the vehicle and visit restaurants and facilities. This presents a business opportunity for local establishments, but also a safety concern if that means crossing heavy traffic between the charger's location and such businesses.
- Many EVs are now towing a trailer, which means sites that require perpendicular parking to charge will either have the vehicle and trailer blocking adjoining spaces while charging. Alternatively, the driver will need to safely locate the trailer elsewhere, unhitch, charge, and reconnect. Drivers with trailers consume more energy per km driven, thus require more charging stops. Designing the site to allow at least one pull-through space addresses this problem.
- Engagement with the local municipality to educate decision makers and coordinate charger location is helpful to ensure the community benefits. Locating chargers into the municipality while being handy to the highway provides EV drivers with a productive charging experience and the option of supporting local business.

Summary

Drive Electric NL supports Newfoundland and Labrador Hydro's application for the construction and installation of ultra-fast electric vehicle charging stations. Increased charging infrastructure removes barriers to EV adoption, encouraging EV adoption in the province and providing ratepayers a manner for reducing their environmental impact.