

Item - 2. Encouraging EV Charging at Gas Stations and Parking Lots – Climate Emergency Action Plan - Other

Date Received	Time Created	Subject	Position	Content	Name	Organization	Contact Info	Neighbourhood	Attachment
05/18/2022	19:55	PH2 - 2. Encouraging EV Charging at Gas Stations and Parking Lots – Climate Emergency Action Plan	Other	Comments on EV charging at Gas Stations. Letter attached	David Schick	Canadian Fuels Association	s. 22(1) Personal and Confidential	Unknown	Appendix A
05/18/2022	20:36	PH2 - 2. Encouraging EV Charging at Gas Stations and Parking Lots – Climate Emergency Action Plan	Other	Please see attached our submission on this item for consideration at the May 19th meeting.	Madalina Murariu	Parkland Corporation		Unknown	Appendix B



May 18, 2022

Re: Encouraging EV Charging at Gas Stations and Parking Lots

Dear City of Vancouver Council,

On behalf of the Canadian Fuels Association (CFA) member companies¹, we thank you for the opportunity to provide feedback on the Referral Report “Encouraging EV Charging at Gas Stations and Parking Lots – Climate Emergency Action Plan” in advance of the public hearing scheduled for May 19, 2022. Canadian Fuels members refine, distribute and market the fuels that power our trucks, trains, ships, planes and automobiles, including retail stations. We are also among Canada’s largest producers of biofuels and are actively working towards solutions which will allow our refining sector to support Canada’s transition to a lower carbon economy. We recognize that EV vehicles and charging stations have an important role to play in meeting our shared goal of a lower carbon future.

CFA is focused on helping our members support Canada’s climate change goals while continuing to ensure access to a secure, reliable fuel supply for Canadians. As the supplier of 95% of transportation fuels, our sector is key to maintaining a strong, resilient economy while achieving emission reductions that support Canada’s transition to low carbon energy. We recommend ZEV policies targeting effective GHG emission reductions by utilizing a broad spectrum of options, a technology neutral approach to emissions reductions. As such, and with an efficient energy transition in mind, we recommend that ZEV policies be implemented in full respect of the sustainability principles including environmental, social and economic impacts, and options for ZEV policies not be limited strictly to EVs.

We appreciate the opportunity to provide feedback on the proposed plan to encourage EV charging at gas stations, cardlocks and parking lots. CFA members broadly agree with the survey results noted on the final page of the Referral Report and would offer the following thoughts building on the feedback the City of Vancouver has received to date:

- **Market Driven Network Development:** Installation of EV charging may make sense at some retail sites. Ideally, the supply of EV chargers is well aligned with demand from vehicles. This avoids installation of EV charging posts that are not required or are likely to be significantly under-utilized. A phased approach would allow market participants to focus on areas of highest demand first, giving time for uptake of EV vehicles.
- **Timing:** More time is required than the two years proposed to install EV charging. It will take additional time to allow for time for system design, necessary site upgrades, procurement of

¹ Canadian Fuels members: Federated Co-operatives Limited, Imperial Oil Limited, Irving Oil, NARL Logistics LP., North West Redwater Partnership, Parkland Corporation, Petro-Canada Lubricants Inc., Shell Canada Limited, Suncor Energy Products Partnership, Tidewater Midstream and Infrastructure Ltd. and Valero Energy Inc.

charging infrastructure (which can experience supply-chain constraints) and charger installation. Supply chain timelines have been extended in recent years due to the pandemic, and as such, we recommend the time to install EV chargers be extended and a phased approach be allowable to pace the demand on a limited number of suppliers and contractors.

- **Logistical considerations:** We agree that access to charging infrastructure is an important element of EV ownership, but suggest that many existing retail service stations are not best suited to provide this service. Many service stations, especially urban and older service stations, are not equipped with the physical space needed to install charging stations and support the parking required for use, as they are designed to support vehicle flow and the high turnover rates as acknowledged in the proposal. Consistent with previous actions by the council, we recommend that any charging station requirements are limited to new sites or service stations undergoing significant renovations or consider compliance through supporting charging stations at locations with the time and space appropriate for the charging process.
- **Technology Selection:** The City of Vancouver's plans should account for flexibility in what kind of EV charging systems are available across a network of EV chargers. EV charging technology is rapidly evolving. As such broad, EV installation over a short time frame will limit the suite of options available to the consumer. A phased approach would provide time for technology to adapt, resulting in a more diverse network of charging technologies.
- **Consumer Convenience** We suggest that a more appropriate location for charging stations within City of Vancouver are at retail establishments where the facility use pattern is to park a vehicle for a period of dwelling time to support charging while customers are utilizing the services of the establishment. This mitigates the issued identified on page 8 of the proposal highlighting the need for a "significantly more expensive type of EV charger" at Service Stations, and achieves the charging access and emission reduction objectives with the best and most efficient use of capital.
- **Cost:** Cost can be a barrier to installing EV charging, particularly for small business owners.

We recommend that the City of Vancouver consider a phased approach or other site locations that recognizes that installation at some sites may be infeasible for the reasons noted above. We look forward to continuing to work with the City of Vancouver on the future of transportation infrastructure going forward and welcome further discussion.

Sincerely,

s. 22(1) Personal and Confidential

David Schick VP- Western Canada

May 18th, 2022

Vancouver City Council

City Hall

453 West 12th Ave

Vancouver, BC V5Y 1V4

VIA Form Submission

RE: Encouraging EV Charging at Gas Stations and Parking Lots – Climate Emergency Action Plan

On behalf of Parkland Corporation, thank you for the opportunity to provide comments regarding the proposed measures the City of Vancouver is considering to encourage EV charging at gas stations and parking lots. Parkland operates one of the largest networks of gas stations in the City of Vancouver with 17 gas stations, providing trusted and relevant fuel brands and convenience store offerings in the community. Our refinery in Burnaby also supplies 25% of B.C.'s transportation fuel and 30% of Vancouver International Airport's jet fuel.

Parkland believes that climate change continues to be an urgent issue in need of collective action from businesses, governments, and individuals to support a sustainable future as outlined in our most recent sustainability report titled "Drive to Zero". We support governments' goal to achieve net-zero emissions by 2050, in alignment with the 2015 Paris Agreement, and we are proud to play a leadership role in helping governments at all levels reach these targets.

We are committed to continuing to be a leader in low-carbon innovation, and last week we announced our plans to expand co-processing activities and build British Columbia's largest renewable diesel complex. Parkland's low-carbon fuels have less than 1/8 of the carbon intensity of conventional fuels and we achieved record volumes of our low-carbon fuel production at the Burnaby Refinery in 2021. We co-processed over 86 million litres of bio-feedstocks, the equivalent of taking over 70,000 cars off the road. Since 2019 we have more than doubled our low-carbon fuel production year over year.

In 2021, we also announced plans to launch one of the largest networks (by site count) of EV ultra-fast chargers in British Columbia. This network of approximately 25 high-quality sites will be strategically located on major highways and in key cities and towns across our extensive retail portfolio. The network will stretch from Vancouver Island to Calgary and is expected to be open for our customers in 2022.

In 2021, Parkland partnered with Electric Autonomy Canada, the Association des Véhicules Électriques du Québec (AVEO) and the EV Society to launch [The Electric Fueling Station of the Future design competition](https://designawards.electricautonomy.ca/)¹ and help to imagine what the electric fueling stations of the future should look like. Some

¹ <https://designawards.electricautonomy.ca/>

of the key concerns heard through the research for the project reiterated that range anxiety and logistical concerns are still some of the top reasons why people choose not to drive an EV².

In light of the proposed changes Council is considering to encourage and enable EV charging in Vancouver, there are a number of comments and proposals we would like to put forward for consideration that we believe will strengthen the City's efforts.

1. **Customer Experience:** The draft recommendations propose gas station, cardlocks and parking lots will be obligated to provide EV charging or suffer a steep increase in their business license fees. As introduced, the focus of the policy seems to merely seek to address the number of chargers as opposed to improving the EV experience for drivers and potential future adopters. For example, there is no encouragement for an overall positive customer experience for Vancouver's residents at locations with amenities where consumers would be able to rest while they charge their vehicles. We believe this may result in the installation of EV charging infrastructure in locations seldom used that are not enabled to accommodate customers safely and comfortably. Particularly for lower speed chargers that may take over an hour, EV drivers may need to wait for long periods of time with no places to sit, use facilities or, in the case of cardlock sites, unmanned locations that may make drivers feel unsafe at night. We would therefore propose that Council consider an amendment to strike out cardlocks from the list of sites where the new changes should apply. Furthermore, we would recommend that Council consider a model whereby the obligation for number of chargers to be installed follows a company or individual, as opposed to a certain site. This change in application would still allow for the installation of a high number of EV chargers but would also take into consideration that there may be better locations throughout the city that drivers could access including around public places such as grocery stores, restaurants, malls and parks that would safely and securely enable a better EV charging experience.
2. **Fast Charging:** As currently proposed, the recommendations require gas stations to install EV charging infrastructure with a power output of at least 50 kW per hour to qualify for the new reduced business license fee starting in 2025. However, 50kW for charging stations would require users to wait over an hour to charge their vehicles from 20-80% and an increasing number of EV models can now accommodate higher charging speeds. The policy should instead incentivize rapid charging infrastructure that is more likely to be used in the Vancouver and help citizens charge their cars faster. To this end, we would propose recognition at a higher value for faster EV chargers, including allowing one faster charger such as 150 kW to fulfill the requirement for multiple sites as outlined in the model above.
3. **Creating Regulatory Flexibility:** Real estate space in Vancouver is at a premium, and gas stations and cardlocks are generally purpose-built without a high level of unused lands that could accommodate additional infrastructure. Additionally, the installation of any new EV infrastructure can only occur in collaboration with third-party utility providers which may be constrained by capacity limitations. This may inadvertently impact the ability to install charging

² Yakub, A. M., Yakub, M., & *, N. (2022, January 12). *Exclusive: Electric Autonomy Drivers Survey Studies Ideal EV charging stop*. Electric Autonomy Canada. Retrieved from <https://electricautonomy.ca/2022/01/11/canadian-ev-drivers-survey/>

locations at all sites due to factors outside of the site-owner's control. Penalizing owners in this situation with significant licensing fees seems unfair and would not help achieve Council's goals. We would therefore propose that Council should consider a holistic approach to addressing policies and by-laws to policy barriers to installation and consider replacement options for sites unable to be changed.

4. **Encourage Standardization of Charging Equipment and the use of Open Networks:** Demand for EV charging stations has increased substantially in Canada in the last few years, at a compound average rate of 46% annually for the past five years³. However, not all charging stations provide options for all the existing types of electric vehicle plugs, nor do they function on an open network model, creating confusion and added anxiety for drivers. We would encourage Council to consider adding requirements for all EV charging stations to provide open-network access to ensure no limitations on access for EV drivers.

5. **Timing Considerations:** As proposed, the new requirements are slated to come into effect in January of 2025. However, companies are increasingly seeing the effects of supply chain disruptions and impacts as a result of the COVID-19 pandemic and other world events such as the war in Ukraine. The timeline proposed does not offer any regulatory flexibility should charging equipment be unavailable or in short supply due to the intersection of supply chain impacts and increased demand. We would therefore propose the City consider a gradual rollout of the policy over 2025-2027 with a moratorium on penalties until 12-24 months after the regulations come into effect to ensure businesses can plan in advance and budget adequate time for implementation.

Parkland is grateful to City Council for the opportunity to highlight these concerns and opportunities in enabling a robust EV charging network within the City of Vancouver. As more policies and regulations are developed to enable the adoption of electric vehicles in Canada, Parkland would encourage continued regulatory and legislative alignment to increase adoption and participation rates across jurisdictions.

We welcome the opportunity to further discuss our comments as the stakeholder engagement process continues.

Sincerely,

Matt Noel-Bentley

Director, Regulatory

Parkland Corporation

³ IEA, "GlobalEVOutlook2020," 2020. [Online]; www.connaissancedesenergies.org/sites/default/files/pdf-actualites/Global_EV_Outlook_2020.pdf