

May 12<sup>th</sup>, 2021



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Honourable Bruce Ralston  
Minister of Energy, Mines and Low Carbon Innovation  
Province of British Columbia  
PO Box 9060 Stn Prov Govt  
Victoria, BC V8W 9E2

By email to: [EMPR.Minister@gov.bc.ca](mailto:EMPR.Minister@gov.bc.ca)

**RE: Electricity reporting under the *Greenhouse Gas Reduction (Renewable and Low Carbon Fuel Requirements) Act***

Dear Minister Ralston:

The Province has committed resources to expanding clean vehicle infrastructure, including investments in home, workplace and public electric vehicle (EV) charging stations. The private sector has played a significant role in helping British Columbia create one of the largest public charging networks in Canada.

Many of our members own and operate EV charging stations at commercial real estate sites across BC and Canada. Over time, they plan to continue investing in and expanding EV infrastructure across the province.

We understand the Ministry is currently reviewing its policy on electricity reporting under the *Greenhouse Gas Reduction (Renewable and Low Carbon Fuel Requirements) Act*. We want to take this opportunity to share our thoughts on how the policy could better support the expansion of EV charging infrastructure in BC.

We suggest that for public EV charging stations with a site host, credits should be allocated to the site host (or project investor).

Supported by multiple studies, it is well known that the lack of charging infrastructure is a major barrier to mass EV adoption. We strongly believe the credits generated under the *Act* should be granted by default to the site hosts or project investors (i.e., those providing the opportunity to charge).

Site hosts and/or project investors invest in needed infrastructure, which can include electrical upgrades, electrical engineering design, service utility upgrade, civil engineering work, project management, EV charging equipment, networking fees and real estate land. In addition, site hosts carry all the risk related to the project and often use their own real estate to accommodate EV charging stations.

The federal government is currently reviewing the Clean Fuel Standard (CFS) and has proposed regulatory changes to allocate carbon credits to network operators for public EV charging by default. We are disappointed the federal government has chosen this approach as it has the potential to impact the growth of EV charging infrastructure. We encourage your Ministry to adopt a more logical approach – those who invest in EV infrastructure should claim any credits associated with that infrastructure.

We also encourage the Province to take a flexible approach to electricity reporting. A good model can be found from the California Air Resources Board's Low Carbon Fuel Standard<sup>1</sup>, where reporting can happen in many ways depending on whether the entity collecting credits wants to be actively involved or prefers to outsource reporting. This encourages accurate and consistent credit reporting.

We appreciate the opportunity to share our views with you. We would be happy to discuss this further and provide any further feedback you may need from the BC commercial real estate industry.

Sincerely,



Damian Stathonikos

President

Building Owners and Managers Association of British Columbia (BOMA BC)

cc: Hon. George Heyman, Minister of Environment and Climate Change

cc: Michael Rensing, Director, Low Carbon Fuel Branch

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<sup>1</sup> <https://ww2.arb.ca.gov/our-work/programs/low-carbon-fuel-standard/about>