

ELECTRIC MOBILITY CANADA COMMENTS ON THE CLEAN FUEL STANDARD (CFS) DISCUSSION PAPER April 2017

Introduction

EMC is the only national organization dedicated exclusively to the acceleration of Electric Transportation in all modes of transportation, and representing the complete value chain of this industry. The recommendations to address barriers to accelerating electrification of transportation have already been made by EMC. They include making electric vehicles better known, more accessible and affordable, for individuals, fleets, and car sharing companies, and improving the availability and efficiency of electrified public transit. Transportation electrification is the readily available and concrete solution now.

In complement to a Pan-Canadian Pricing on Carbon Pollution, EMC welcomes the introduction of a Clean Fuel Standard, to even better support specific goals in transportation electrification. The recognition of the contribution of electricity as a clean fuel, in the short term, but even more in the long term is a meaningful way to support transportation electrification, and attain our GHG emissions reductions.

Comments on the CFS discussion paper

In general, EMC supports the key elements of the CFS announced on November 25, 2016¹. The harmonization between federal and provincial regulations, regional flexibility, sound principles of a simple administration of the standard, and lessons learned from standards in Canada should guide the development of the CFS.

Our main comment concerns the regulated parties. Since the standard applies to fuel providers, taking into account their imports or production, the consistent approach would be to regulate the utility that sells the electricity to end customers, that will be used for transportation by the customer, as done in BC's LCFS regulation².

Furthermore, the advantages and leverage that utilities present are important. Many of them are already greatly involved in infrastructure deployment, working closely with governments and investing to support EV objectives. Their governments can set clear orientations and formal directions to set aside the revenues from the standard, reinvesting a significant part of those revenues to support transportation electrification in their respective jurisdictions.

¹https://drive.google.com/drive/folders/0B51NNz63xpM_Y1FtMkIMVWg5dWs?usp=sharing

² http://www2.gov.bc.ca/assets/gov/farming-natural-resources-and-industry/electricity-alternative-energy/transportation/renewable-low-carbon-fuels/ele000_-_part_2_fuel_supplier_july_2016.pdf