

Adnan Rashid
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October 6th 2023

Dear Mr Rashid,

On behalf of Electricity Canada, thank you for the opportunity to comment on Measurement Canada's recent consultation, S-E-EVSE-XX - Specifications for the approval of type of electric vehicle supply equipment, and P-E-EVSE-XX - Procedures for type approval testing of electric vehicle supply equipment pursuant to the requirements of specifications S-E-EVSE-XX.

Electricity Canada (formerly the Canadian Electricity Association) is the national forum and voice of Canada's evolving and innovative electricity business. Electricity Canada members generate, transmit, and distribute electrical energy to industrial, commercial, residential, and institutional customers across Canada. We currently represent 41 members and 90 corporate partners, which include integrated electric utilities, independent power producers, transmission and distribution companies, power marketers, system operators, technology vendors and service providers.

We have received substantive comments from our member companies on the proposed draft regulations, and have attached them in Appendix A in the format which you specified, however, over and above a direct response to this draft, our members are still seeking clarification on who will be responsible for the calibration of equipment (and the frequency thereof), and if this is to be achieved using Measurement Canada staff, how will this task be integrated into the new organizational structure?

Our members are concerned that Measurement Canada may not be adequately resourced to fulfill its mandate, and that these additional duties will fall upon utilities to conduct. This would potentially cause harm to the operation of the utilities, as they may be required to mobilize additional teams to take on these tasks, but it could also cause harm to the reputation of utilities if there was ever a dispute about energy consumption by customers. Customers rely upon Measurement Canada for assurances that the meter on the till matches the energy consumption; Measurement Canada guarantees integrity in the metering.

We understand and appreciate that Measurement Canada is reacting to a fluid and ever-shifting electric ecosystem, and that the modernization of the grid and the acts which govern it remains the highest priority for the agency, but the number of charging stations that will be required by 2035 is 20-fold what is currently in operation. How will the agency grow respectively to meet its mandate?

If Measurement Canada elucidates its position and thinking around this area, it will improve Canadian businesses' ability to plan, operationalize, and respond, to the benefit of all Canadians the agency serves.

Attached alongside this letter are additional substantive comments from our members, respectfully submitted.

Kind regards,

Channa Perera
Vice President, Regulatory and Indigenous Affairs, Electricity Canada

