

**Corporate
Services**

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Katerina Downard
Ministry of Transportation
Environmental Policy Office
438 University Ave, 12th Floor
Toronto, ON M7A 1N3

RE: Regional Municipality of Peel comments on ERO 019-6000 Building Public Electric Vehicle Charging Infrastructure

Thank you for the opportunity to comment on this important proposal. The following comments have been prepared for Ontario's Ministry of Transportation (MTO) by representatives from the Region of Peel's ("Region's") Office of Climate Change and Energy Management.

The Region is proud to report there are more than 10,000 electric and plug-in hybrid vehicles registered to residents within our growing community, and the [Peel Zero Emission Vehicle Strategy](#) recognizes equitably enabling public charging infrastructure deployment is a clear next step to expedite the uptake of electric vehicles.

Question 1: Where are the geographic areas in Ontario where there are gaps in public EV charging infrastructure?

As the MTO aims to identify geographic 'gaps' in public charging infrastructure, the Region encourages the following data sources are taken into consideration:

- The current number and growth trends of Green Vehicle ("GV") license plate registrations by Ontario postal code
- The most recent [Transportation Tomorrow Survey](#)
 - Aids in identifying dwelling types within neighbourhoods (*e.g. houses, townhouses, or apartments*)
 - There will be an increased need for public charging infrastructure in areas where a higher percentage of the population lives in multi-unit residential buildings and rental properties¹
 - Aids in understanding a neighbourhood's commuting mode share, trip lengths (km), and the number of trips made to and from surrounding areas
- Locations where a single direct current fast charger (DCFC) is installed
 - A recent [report](#) commissioned by Natural Resources Canada recommended a two-port minimum for DCFC sites, where each port can be used simultaneously. This will prevent queues and wait times as more EV drivers need to access fast charging infrastructure.

¹ [Updated Projections of Canada's Public Charging Infrastructure Needs \(nrcan.gc.ca\)](#) – see 4.1.2 "Home Charging Adjustment"

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Question 3: What are the challenges with increasing public EV charging in Ontario and how could the government help address those challenges?

The Peel ZEV Strategy seeks to enable the deployment of public charging infrastructure by requiring EV-ready parking for new developments. The Region's local municipalities are currently implementing and investigating updates to parking by-laws to require a certain percentage of new parking spaces to be equipped with or ready for Level 2 charging. During this process it has been difficult to establish if enacting these requirements is within the municipal sphere of jurisdiction as defined in the Municipal Act.

Clarifying a municipality's authority to require EV charging infrastructure or re-introducing EV charging requirements into the Ontario Building Code are opportunities for the Province to help increase investments in public and private charging infrastructure.

The Region is an advocate for supportive policies and programs for a future diversified and decentralized energy system. EV batteries are mobile energy storage devices and there is potential to leverage them for cost effective grid services.

When developing the application process and scoring criteria for this funding program, the Region encourages the Province to consider allocating points or additional funding for applicants who are proposing to install bi-directional EV chargers, and/or integrating chargers with battery energy storage and renewable energy systems.

Costs for electrical service and infrastructure upgrades at facilities on public lands are a major challenge the Region is encountering when evaluating EV charger installations.

The Region has assessed future charging requirements to support Peel Regional Police, Paramedics, Public Works, and accessible transportation fleets. Of the 16 properties evaluated, nine would require electrical service upgrades. The Region is now investigating if upgrades to grid transformers (utility assets) may also be required to support these sites. If so, these costs would currently be flowed through from the local distribution company (electric utility) to the Region.

Planning for the future electrification of municipal fleets often makes charging infrastructure a critical electrical load. Upsizing, replacing or installing new back-up power generators or energy storage systems for charging stations will be required to ensure business continuity in the face of a power outage.

Grants to support EV charger installations on a unitary basis are valuable; however, the Province should consider direct funding to municipalities to prepare public lands for future EV charging station deployment, as well as to electric utilities to upsize and upgrade grid infrastructure to support increased electrical service requirements locally.

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Thank you for the opportunity to provide comments on the Province's proposed funding program to build more public EV charging infrastructure.

The Region hopes this letter sheds light on the broader investment requirements to make public lands EV-charging ready, highlights policy considerations to enable charger installations, and leads to the development of Provincial program(s) that support more bi-directional charging, battery energy storage systems and renewable energy generation.

Please feel free to contact me with any questions or comments.

Sincerely,



Christine Tu, Director

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