

The Honourable Catherine McKenna
Minister of the Environment and Climate Change
House of Commons, Ottawa
Ontario K1A 0A6
via email

May 22, 2018

Dear Minister McKenna,

We, the undersigned, are writing to affirm our position that electricity used to charge electric vehicles (EVs) must be recognized as a clean fuel under the Clean Fuel Standard (CFS). In order to achieve the stated 30-megatonne greenhouse gas reduction goal, efforts must be made to maximize the use of all types of clean fuel, of which electricity in Canada is most certainly one. To this end, we also recognize and support the government's existing commitment to consider electricity pathways in the CFS and note that any such pathway should be in place from the outset of the program's implementation.

In developing the electric transportation pathway, the government should design a program capable of counting 100% of EV charging sessions wherever these sessions may take place in Canada. In other words, the session should be counted regardless of geography (province or territory) or charging session type (whether at home, work or highway-side).

We further believe that revenues generated by credit holders within the electric transportation pathway should be reinvested only into initiatives that help to accelerate EV adoption. Examples of such activities include: point of sale incentives, charging infrastructure development, matching of charging infrastructure with renewable generation, and support for educational activities at EV discovery centers and through owner groups.

We are confident that an approach can be found to achieve these objectives without introducing any significant complexity or administrative burden. Ultimately, ensuring that all electricity used for mobility is counted as a clean fuel from the outset of the CFS is critical to the program's long-term success.

Yours sincerely,

Simon-Pierre Rioux
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du Québec**

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CC: The Hon. Jim Carr, Minister of Natural Resources
The Hon. Marc Garneau, Minister of Transport
The Hon. Navdeep Bains, Minister of Innovation Science and Economic Development
Stephen Lucas, Deputy Minister, Environment & Climate Change Canada
Marlo Reynolds, Chief of Staff, Office of the Hon. Catherine McKenna
Sarah Goodman, Policy Advisor, Prime Minister's Office