

September 8, 2025

Board of Commissioners
of Public Utilities
P.O. Box 21040
120 Torbay Road
St. John's, NL A1A 5B2

Attention: Jo-Anne Galarneau
Executive Director and Board Secretary

Dear Ms. Galarneau:

Re: Newfoundland and Labrador Hydro ("Hydro") – Application for the Construction and Installation of Ultra-Fast Electric Vehicle ("EV") Charging Stations – Phase 2 (the "Application")

Newfoundland Power Inc. ("Newfoundland Power" or the "Company") does not object to Hydro's Application on the following basis:

- All revenues and costs associated with the assets in the Application will be recorded to Hydro's non-regulated operations and therefore will not be recovered from Newfoundland Power, or its customers.¹
- The operation of the solar and battery system is designed to sufficiently meet the annual energy usage at the Southern Labrador charging sites for the initial years following installation.² As such, it is expected that there would be no cost impact on the rural deficit, and therefore no cost impact to Newfoundland Power's customers, in the shorter term.

While the Company does not object to the Application, it submits that the operation of the solar and battery system, which are non-regulated assets, should not have a cost impact on the rural deficit. Hydro provides it has the ability to track site energy consumption versus solar production.³ Hydro's tracking may allow actual and forecast rural deficit impacts to be reported to the Board of Commissioners of Public Utilities to permit the parties to address potential customer cost impacts in a timely manner.

¹ See the response to part b) of Request for Information ("RFI") PUB-NLH-003, which states "*Hydro is proposing to record the capital costs, operating costs, revenues, and government funding associated with the proposed EV chargers in non-regulated operations.*" Further, in the response to RFI PUB-NLH-001, Hydro states "*...Hydro has proposed that its isolated Direct Current Fast Chargers include solar generation for energy, batteries for capacity, and a minimal grid connection for reliability.*"

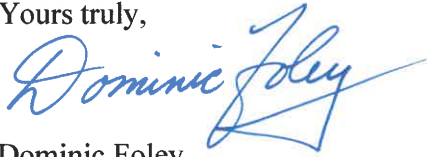
² See the response to RFI PUB-NLH-001, page 2, lines 3-8.

³ See the response to RFI PUB-NLH-001, page 2, lines 9-16.

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We trust this is in order. If you have any questions regarding the enclosed, please contact the undersigned.

Yours truly,



Dominic Foley
Legal Counsel

Enclosures

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