# Office of the Consumer Advocate

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August 22, 2025

***Via Email***

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

**Attention: Jo Galarneau**
**Executive Director and Board Secretary**

Dear Ms. Galarneau:

**Re: Newfoundland and Labrador Hydro – Application for the Construction & Installation of Ultra Fast Electric Vehicle Charging Stations – Phase 2 – Requests for Information CA-NLH-001 to CA-NLH-013**

Further to the above-captioned, enclosed are the Consumer Advocate's Requests for Information numbered CA-NLH-001 to CA-NLH-013.

If you have any questions regarding the enclosed, please contact the undersigned at your convenience.

Yours truly,

**Dennis Browne, KC**
**Consumer Advocate**

Encl.
/jm

cc **Newfoundland Power Inc.**
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**IN THE MATTER OF** the *Electrical Power Control Act, 1994, SNL 1994, Chapter E-5.1 ("EPCA")* and the *Public Utilities Act, RSNL 1990, Chapter P-47 ("Act")*, and regulations thereunder; and

**IN THE MATTER OF** an Application by Newfoundland and Labrador Hydro ("Hydro") for an Order approving Phase 2 of the construction and installation of Ultra-Fast Direct Current Fast Chargers pursuant to Section 41(3) of the *Act* ("Application").

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**CONSUMER ADVOCATE**
**REQUESTS FOR INFORMATION**
**CA-NLH-001 to CA-NLH-013**

**Issued: August 21, 2025**

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CA-NLH-001 (Reference Application Clause 2) It is stated "*Hydro currently operates a network of 23 public DCFCs in the province, including 14 units installed along the Trans-Canada Highway ("TCH"). Since their commissioning in August 2021, usage has increased significantly, resulting in congestion and user wait times during peak travel periods.*"

a) Is the price for charging sessions at these DCFC fixed at a level that covers all of Hydro's costs, including capital cost, of these charging stations? If not how is the price set?

b) Are any of Hydro's existing DCFC stations in Newfoundland Power's service areas? If so, at what rate does Hydro purchase electricity from Newfoundland Power and how much of a mark-up does Hydro add to that for the retail price?

c) How many non-utility-owned commercial DCFC EV charging stations are operating in the province?

d) Is Hydro aware of any market or legislative obstacles for businesses that wish to operate commercial EV charging stations in the province?

CA-NLH-002 (Reference Application Clause 3) Regarding units put in place in Phase 1 of the Ultra-Fast DCFC project, which was approved under P.U. 21(2023), it is stated "*They are also expected to result in a further increase in public charging by electric vehicles ("EV") owners.*" Subsequently, in the Reliability and Resource Adequacy Study Review – 2024 Resource Adequacy Plan, Hydro has indicated serious capacity shortfalls so that, in addition to Bay d'Espoir Unit 8, a 150 MW combustion turbine and 400 MW of wind generation are included in Hydro's "minimum investment required" for the island system but even more capacity may be needed. How does encouraging EV adoption help to reduce the island system's capacity shortfall?

CA-NLH-003 (Reference Application Clause 5) It is stated "*Hydro has the opportunity to avail of funding from the Government of Newfoundland and Labrador ("Government") to install additional DCFCs at seven charging sites across the province, with a capability of charging 14 vehicles simultaneously, as well as two additional chargers as backup for the two proposed sites in Labrador ("Project"). These chargers will add further capacity for growth and alleviate congestion, in addition to providing faster charging times reflecting advancements in EV charging technology.*"

a) What is the deadline imposed by government for Hydro to avail of the funding?

b) What conditions has the government placed on Hydro for it to receive the funding?

c) Has the government indicated what happens to the funding if Hydro is unable to avail of the funding by the deadline? For example, will be deadline be extended, will the funding be opened up to other parties, etc?

d) Have advancements in charging technology made Hydro's existing chargers obsolete?

e) Rather than add new chargers, could Hydro simply replace existing chargers with more advanced technology?

f) Was there a federal government contribution, either directly or through the

Government of Newfoundland and Labrador's contribution, to Phase 1 of the Ultra-Fast DCFC project and is there any federal funding involved in this Phase 2 proposal?

CA-NLH-004

(Reference Application Clause 7) It is stated "*Hydro is proposing to install two 120 kW chargers at two sites (L'Anse-au-Loup and Port Hope Simpson) in Labrador. Each unit has two charging connections, with the capability of charging two cars simultaneously. Each site will also include a backup charger for a total of three plugs per site for Southern Labrador.*"

a) How will the backup chargers be utilized; e.g. will they always be available for use, or will they only be available when one of the main chargers fails?
b) Does Hydro propose to connect the backup chargers to the solar/battery storage system?

CA-NLH-005

(Reference Application Clause 8) It is stated "*There are unique challenges associated with deploying DCFC infrastructure in Southern Labrador due to its reliance on remote diesel generation. To address the service gap while minimizing impact on the electrical system and rural deficit, Hydro intends to pair each of the proposed chargers in this region with solar generation and battery storage. This configuration is designed to allow charging to over 100 vehicle charges annually with minimal grid demand, necessary only for reliability.*"

a) Please quantify "over 100". Is it 101 to 120 or 150 or 200?
b) How many vehicle charges are possible weekly "with minimal grid demand"?
c) If, during summer time, 20 BEVs a week were to stop to charge at one of these locations, how many could be charged via solar/battery power and how many would rely on diesel generated electricity?
d) If 300 vehicles charges were sought at each of these locations over the course of a year and in a monthly pattern consistent with Chart 1, what would be the impact on their respective diesel systems?
e) Please provide Hydro's projected annual demand for charging sessions at these charging stations.
f) What portion of the total Southern Labrador project cost relates to the solar/battery storage installations and how much of this cost will be funded by government?
g) Please provide an analysis that compares the cost of the proposed solar/battery storage system to the alternative of running these stations with electricity generated by diesel.
h) What price would Hydro set for charging sessions at these locations? Would it be sufficient to cover all of Hydro's related costs?
i) How would investment in and operation of these charging stations affect the rural deficit?

CA-NLH-006

(Reference Application Clause 10) It is stated "*Hydro will contribute the remaining funds necessary for the Project; however, the capital funds Hydro expends on this Project are not proposed for inclusion in its regulated rate base for recovery from customers at this time.*"

a) When might Hydro propose to include these costs in its regulated rate base?

b) Does delaying the timing of inclusion in Hydro's rate base lead to a saving for ratepayers over the life of the asset?
c) Will Hydro include operating and fuel costs for the charging stations in its cost of service filed at its next GRA?
d) How will revenues from charging stations be treated in Hydro's cost of service filed at its next GRA?

CA-NLH-007 (Reference Schedule 1, page i) It is stated "*This project will allow for increased numbers of EVs to be owned and operated within the province which will serve to significantly reduce Greenhouse Gas ("GHG") emissions when compared to internal combustion engines.*"
a) What is the estimated annual reduction in GHG emissions resulting from this specific project?
b) Would this project significantly reduce GHG emissions when compared to plug-in hybrid electric vehicles?
c) What benefits do customers receive from Hydro's promotion of increased electricity consumption for EV charging when it has a $131.6 million capital budget for 2026, a $2 billion Build Application, hugely expensive life extension programs at Holyrood TGS and Bay d'Espoir, additional capital spending for the Reliability and Resource Adequacy Study (e.g., wind turbines, transmission, etc.) and Newfoundland Power's $140.4 million capital budget?
d) How much capital does Hydro expect will be spent on behalf of customers between now and 2035 by the province's two electric utilities?
e) What does Hydro expect rates (unmitigated) to be in 2035 and how does that compare to rates today?
f) How does rate mitigation benefit electricity consumers and what are the pros and cons?

CA-NLH-008 (Reference Schedule 1, pages i and ii) It is stated "*The life-to-date reduction in GHG emissions from Hydro's existing EV chargers is estimated at nearly 1,200 tons.*"
a) At what price does Hydro value each ton of reduced GHG emissions?
b) Does that 1,200 ton figure net out the increase in emissions from thermal units that contribute to electricity used by EVs during the winter months?
c) In 2024 what was the total GHG emissions from the Holyrood TGS and the average GHG emissions per day?

CA-NLH-009 (Reference Schedule 1, page 2). Please extend Table 1 (Total DCFC Sessions at Existing Sites) by showing for 2024 the kWh sold, revenue, and cost and also include Hydro's initial capital cost of each site.

CA-NLH-010 (Reference Schedule 1, page 6) It is stated "*Hydro considered the following alternatives: Project deferral; and Construct and install Ultra-Fast DCFCs.*" Why is the "do nothing" alternative not included in the analysis? Specifically, please provide a benefit-cost analysis for the project where the alternative is not doing it.

CA-NLH-011 (Reference Schedule 1, page 7) It is stated "*Proceeding with this project will enable Hydro to meet growing customer demand (including higher charging acceptance rates of new EVs), and lower GHG emissions from the transportation sector, all while availing of third-party funds.*" Please cite the reference in legislation stating that promoting higher charging acceptance rates and lowering GHG emissions in the transportation sector are part of Hydro's mandate.

CA-NLH-012 (Reference Schedule 1, Table 3 – Project Estimate)

a) In light of Hydro's recent experience with large increases in equipment and labour costs, what confidence level does Hydro have in the estimate provided in Table 3?
b) How will any cost overruns be allocated between Hydro and the government?
c) What are the forecast annual expenses of these proposed charging stations once they become operational?
d) Would pricing of vehicle charging be set to fully recover all Hydro's capital investment and operating costs from EV customers? If not, how would Hydro set the price and how would any deficit be funded?
e) Would the two Labrador charging sites have the same pricing as on the island?

CA-NLH-013 (Reference Hydro's 2026 Capital Budget Application, 2025 Capital Expenditures Overview, page 16) With respect to the $720,000 cost variance for the Phase 1 project, it is stated "*In 2024, additional funding was secured by the Government of Newfoundland and Labrador, and the number of planned new chargers has increased to ten.*"

a) Did the Board approve additional funding for more chargers? Are customers responsible for these costs?
b) Is the forecasted variance of $720,000 entirely the result of increasing the number of chargers from seven to ten, or were there other cost drivers?
c) For the total expenditure of $2.7798 million, what are the contributions from the federal government, the provincial government and Hydro?

**DATED** at St. John's, Newfoundland and Labrador, this 21st day of August, 2025.

Per: _____

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