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2025-08-21

Newfoundland and Labrador Hydro

Shirley Walsh

E-mail: shirleywalsh@nlh.nl.ca

Dear Ms. Walsh:

Re: Newfoundland and Labrador Hydro - Application for the Construction and Installation of Ultra Fast Electric Vehicle Charging Stations - Phase 2 - To NLH - Requests for Information - Corrected

Enclosed are Requests for Information PUB-NLH-001 to PUB-NLH-007 regarding the above-noted matter.

If you have any questions, please do not hesitate to contact the Board's Legal Counsel, Ms. Jacquelyn, by email, jglynn@pub.nl.ca or by telephone 709-726-6781.

Sincerely,

Jo-Anne Galarneau

Executive Director and Board Secretary

JAG/cj

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1 **IN THE MATTER OF** the **Electrical Power**
2 **Control Act**, 1994, SNL 1994, Chapter E-5.1
3 (the “**EPCA**”) and the **Public Utilities Act**, RSNL
4 1990, Chapter P-47 (the “**Act**”), as amended,
5 and regulations thereunder; and
6
7 **IN THE MATTER OF** an application by
8 Newfoundland and Labrador Hydro for an
9 Order approving Phase 2 of the construction
10 and installation of Direct Current Fast Chargers
11 pursuant to section 41(3) of the **Act**.

PUBLIC UTILITIES BOARD
REQUESTS FOR INFORMATION

PUB-NLH-001 to PUB-NLH-007

Issued: August 21, 2025

- PUB-NLH-001** Phase 1 of the Ultra-Fast DCFC Electric Vehicle Chargers Project was approved by the Board in Order No. P.U. 21(2023). In that application, it was noted that the Provincial Government would hold legal title to these chargers for an initial three-year period before being transferred to Hydro and that Hydro would operate and maintain the chargers on the Government's behalf.
- (a) Please provide an update to the legal title plan for the chargers approved in Order No. P.U. 21(2023).
 - (b) Please confirm if the Provincial Government will also hold legal title to the chargers proposed in this Application, including the solar generation and battery backup for the charging stations on the isolated systems. Please explain the approach.
 - (c) For the assets on the isolated systems, please explain how the services will be billed and whether the full costs including the cost of generation will be reflected in the rates. If not, explain how the shortfall will be recovered.
- PUB-NLH-002** Please explain if the cost of system upgrades/extensions for the charging stations on the isolated systems are reflected in the proposed capital cost. If not, please provide a cost estimate for the system upgrades/extensions for each charging station and advise whether or not Hydro will be recovering these costs from rate payers.
- PUB-NLH-003** The Electrification Cost Deferral Account ("Deferral Account") approved in Order No. P.U. 33(2023), includes capital costs incurred for EV chargers as well as the net operating costs of the chargers for future recovery from rate payers. In the Application, Hydro states that funds expended will not be proposed for inclusion in its regulated rate base for recovery from customers "at this time."
- (a) Is Hydro proposing to include the capital costs contributed by Hydro as part of this Application, as well as the net operating costs of the proposed EV chargers, in this Deferral Account? If the Deferral Account is not being used, please explain why and how these costs are being recorded.
 - (b) Is Hydro proposing to include the capital costs contributed by Hydro as part of this Application, as well as the net operating costs of the proposed EV chargers in non-regulatory operations? If so, does Hydro anticipate that in a future year it may propose to move the chargers from non-regulated operations to regulated operations to recover the costs from rate payers.
- PUB-NLH-004** In Order No. P.U. 21(2023), the Board approved \$2,059,800 for the construction and installation of seven ultra-fast DCFC electric vehicle chargers. In this Application, Hydro is proposing a capital expenditure of approximately \$4,263,000 for the construction and installation of seven

DCFCs which includes five 400 kW ultra-fast chargers and two 120 kW chargers, as well as two additional chargers for backup.

- (a) Please provide a detailed cost breakdown for the purchase and installation of the 400 kW ultra- fast charger(s), 120 kW charges, the solar generation and battery backup and backup chargers proposed for Southern Labrador.
- (b) Please provide a cost breakdown for the purchase and installation of the chargers by site including the solar generation and battery backup proposed for Southern Labrador.
- (c) Please explain the increase in the proposed capital expenditures in this Application as compared to the cost of chargers approved in Order No. P.U. 21(2023).

PUB-NLH-005

In Schedule 1, page ii, Hydro stated it has secured approximately 90% of the funds required for this project from Government with minimal expenditure of Hydro funds. The footnotes states: "The Government has committed \$3.8 million towards this project. These amounts and funding ratios are subject to final project costs." Please provide more detail on the funding criteria, including but not limited to, how the final amount of funding will be determined, and whether it is based on the number of chargers/stations and/or the location. If so, please provide a breakdown of the funding for each charging station.

PUB-NLH-006

Order No. P.U. 30(2021) Reasons for Decision stated the following with respect to the installation and promotion of EV charging infrastructure on the interconnected system:

"These stations are a critical first step toward the electrification of the province so as to maximize the benefits of the forecast surplus energy upon the commissioning of the Muskrat Falls Project. The geographic coverage provided by the proposed EV charging stations will address a primary barrier to EV adoption and the resulting increase in EV uptake should improve the business case for future private investment. The Board is satisfied that investment by the utilities in EV charging infrastructure is the best currently available tool to contribute to increased EV uptake in the province which will ultimately contribute to increased sales of electricity, increased revenues and, with appropriate load management measures, reduced costs for customers."

- a) Please describe the expected distribution and generation system impacts of EV usage to customers on isolated systems given that most EV charging typically occurs at customers' homes.
- b) Please describe how Hydro is proposing to limit the costs associated with serving the additional capacity and energy requirements on isolated systems to ensure "minimal impact on the diesel electrical system or the rural deficit", as stated in Schedule 1, page 7.

- 1 c) Is Hydro aware of approaches being employed in other jurisdictions
 2 in Canada to manage the system impacts of promoting EV usage on
 3 isolated systems? Please discuss.
 4 d) Is Hydro aware of any EV purchase or charger rebates available to
 5 customers on isolated systems? Please explain.
 6

7 **PUB-NLH-007** In the response to PUB-NLH-033 in the Electrification, Conservation and
 8 Demand Management Plan 2021-2025 application, Hydro stated:
 9

10 "Newfoundland and Labrador Hydro ("Hydro") is only seeking to offer
 11 electrification programming on the Island Interconnected System. Under
 12 Hydro's 2021-2025 Electrification, Conservation and Demand
 13 Management Plan, no electrification programs will be offered to
 14 customers in Hydro's isolated systems."
 15

16 Please describe Hydro's overall intention and strategy with respect to
 17 expanding EV charging infrastructure to include isolated systems. In the
 18 response, please highlight any differences in approach compared to the
 19 interconnected system.

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

BOARD OF COMMISSIONERS OF PUBLIC UTILITIES

Per



Jo-Anne Galarneau

Executive Director and Board Secretary