

1 Q. **Reference: CA-NLH-024)**

2 It is stated “*Hydro cannot speak to Manitoba Hydro’s Integrated Resource Plan, particularly in*
3 *the context of CDM programming, which is primarily offered on the Island Interconnected*
4 *System by Newfoundland Power.*” Has Hydro done any benchmarking of CDM and customer-
5 owned generation forecasts in NL to amounts attained or proposed in other jurisdictions in an
6 effort to ascertain the reasonableness of its own forecasts and programs? If so, please provide
7 the results of the benchmarking exercise.

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10 A. Newfoundland and Labrador Hydro (“Hydro”) has not completed any benchmarking of
11 Newfoundland Power Inc.’s (“Newfoundland Power”) customer owned generation forecasts.

12 Hydro notes that each utility reports annually to the Board of Commissioners of Public Utilities
13 the results of their net metering programs including customer uptake. At the end of 2025,
14 Newfoundland Power had 79 net metering projects in service with a total installed capacity of
15 987.8 kW.¹ At the end of 2025, Hydro had three net metering customers with an installed
16 capacity of 71.6 kW, only one of which was located on the Island Interconnected System.²
17 Combined, both programs represent an installed capacity of approximately 1.1 MW of a
18 provincial maximum of 5 MW as specified in the Net Metering Exemption Order.³ The majority
19 of installations are solar generation which would have a very limited impact on winter peak.

20 In the most recent Conservation and Demand Management (“CDM”) Plan completed by Hydro
21 and Newfoundland Power, demand reduction capacity as a percentage of system peak was
22 benchmarked against other Canadian utilities using data from an Electricity Canada survey and E
23 Source. This data showed that the Island Interconnected System had the highest demand

¹ “2025 Net Metering Service Option Annual Report,” Newfoundland Power Inc., March 20, 2026, Table 2.

² “Net Metering Program Report – For the Year Ended December 31, 2025,” Newfoundland and Labrador Hydro, April 1, 2026, Table 1.

³ Government of Newfoundland and Labrador, *Order in Council*, OC2015-148.

1 reduction as a percentage of peak of all utilities surveyed.⁴ These results are largely supported
2 by Hydro's approximately 100 MW of Industrial customer capacity assistance agreements which
3 is significant in the context of the 2027 Test Year forecast peak demand of 1,683.7 MW for the
4 Island Interconnected System.⁵

⁴ "Reliability and Resource Adequacy Study Review – Semi-Annual Update for the Second Quarter of 2026," Newfoundland and Labrador Hydro, June 30, 2026, att. 1.

⁵ "2026 General Rate Application," Newfoundland and Labrador Hydro, May 27, 2026, vol. I, sch. A-I.