

1 **Q. (Reference Application, Customer Service Continuity Plan, page 7) It is stated**  
 2 **“Some functional limitations have already materialized. For example, the billing of net**  
 3 **metering and some large general service customers cannot cost-effectively be delivered**  
 4 **through CSS. These functional limitations are expected to increase over time as**  
 5 **customers’ service expectations evolve. CSS could not, for example, be customized to**  
 6 **deliver time-of-use rates.”**

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 8 **a) How many net metering customers are there currently, and forecast over the**  
 9 **next 5 years?**

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 11 **b) What are NP’s current plans for implementation of time-of-use rates?**

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 13 **c) At any time in history has NP offered its customers time-of-use rates?**

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 15 **d) Can existing Household meters be used for time-of-use rates?**

16  
 17 **e) Can existing General Service meters be used for time-of-use rates?**

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 19 **A. a) There are currently 10 Newfoundland Power customers on the Net Metering Service**  
 20 **Option. The billings for those customers are completed through manual processes.**  
 21 **The Company does not forecast the number of customers on the Net Metering Service**  
 22 **Option.**

23  
 24 **b) Newfoundland Power does not currently have any plan to implement time-of-use**  
 25 **rates. Based on the results of the 2020-2034 Conservation Potential Study completed**  
 26 **in 2019, time-of-use rates, which require interval metering, are currently forecast to**  
 27 **be cost-effective for customers in the 2030 to 2034 timeframe.<sup>1</sup>**

28  
 29 **c) No. Newfoundland Power has never had a time-of-use rates class of service. The**  
 30 **Company did conduct a 2-year study of time-of-use rates from December 2011 to**  
 31 **November 2013.<sup>2</sup> All billing for participants was entered manually in the Customer**  
 32 **Service System (“CSS”) throughout the 2-year study period.**

33  
 34 **d) No. Newfoundland Power’s existing household meters cannot be used for time-of-**  
 35 **use rates. The majority of the Company’s customers are served by automated meter**  
 36 **reading (“AMR”) technology, which is not capable of the interval metering necessary**  
 37 **to support time-of-use rates.**

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<sup>1</sup> Newfoundland Power and Newfoundland and Labrador Hydro commissioned Dunsky Energy Consulting to complete the Potential Study. The study was provided to the Board in response to Information Request PUB-NP-104 in the *Reference to the Board on Rate Mitigation Options and Impacts*.

<sup>2</sup> The results of this study were provided to the Board in response to Information Request PUB-NP-029 as part of the *Reference to the Board on Rate Mitigation Options and Impacts*.

- 1 e) The meters serving customers on *Rate 2.4 General Service (1,000 kVA and Over)* are  
2 the only Newfoundland Power meters capable of interval metering. These meters  
3 could be used for time-of-use rates. However, CSS cannot accommodate time-  
4 varying rates for the purposes of customer billings.<sup>3</sup>

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<sup>3</sup> There are currently 58 customers on *Rate 2.4 General Service (1,000 kVA and Over)*.