



NEWFOUNDLAND AND LABRADOR  
**BOARD OF COMMISSIONERS OF PUBLIC UTILITIES**  
120 Torbay Road, P.O. Box 21040, St. John's, Newfoundland and Labrador, Canada, A1A 5B2

E-mail: shirleywalsh@nlh.nl.ca

2022-02-16

Ms. Shirley Walsh  
Senior Legal Counsel, Regulatory  
Newfoundland and Labrador Hydro  
P.O. Box 12400  
Hydro Place, Columbus Drive  
St. John's, NL A1B 4K7

Dear Ms. Walsh:

**Re: Newfoundland and Labrador Hydro - Approvals Required to Execute Programming Identified in the Electrification, Conservation and Demand Management Plan 2021-2025 Application; and Newfoundland Power Inc. - 2021 Electrification, Conservation and Demand Management Application - Requests for Information**

Enclosed are Requests for Information TC-PUB-NLH-001 to TC-PUB-NLH-004 regarding the above-noted application.

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

Sincerely,

  
Cheryl Blundon  
Board Secretary

CB/rr

Enclosure

**Newfoundland and Labrador Hydro**

NLH Regulatory, E-mail: NLHRegulatory@nlh.nl.ca

**Newfoundland Power Inc.**

Dominic Foley, E-mail: dfoley@newfoundlandpower.com

NP Regulatory, E-mail: regulatory@newfoundlandpower.com

**Consumer Advocate**

Dennis Browne, Q.C., E-mail: dbrowne@bfma-law.com

Stephen Fitzgerald, E-mail: sfitzgerald@bfma-law.com

Sarah Fitzgerald, E-mail: sarahfitzgerald@bfma-law.com

Bernice Bailey, E-mail: bbailey@bfma-law.com

**Industrial Customer Group**

Paul Coxworthy, E-mail: pcoxworthy@stewartmckelvey.com

Dean Porter, E-mail: dporter@poolealthouse.ca

Denis Fleming, E-mail: dfleming@coxandpalmer.com

**Labrador Interconnected Group**

Senwung Luk, E-mail: sluk@oktlaw.com

Julia Brown, E-mail: jbrown@oktlaw.com

**Iron Ore Company of Canada**

Gregory Moores, E-mail: gmoores@stewartmckelvey.com

**Teck Resources Limited**

Shawn Kinsella, E-mail: shawn.kinsella@teck.com

**Praxair Canada Inc.**

Sheryl Nisenbaum, E-mail: sheryl\_nisenbaum@praxair.com

Peter Strong, E-mail: peter.strong@linde.com

1 **IN THE MATTER OF**  
2 the *Electrical Power Control Act, 1994*,  
3 SNL 1994, Chapter E-5.1 (the “*EPCA*”)  
4 and the *Public Utilities Act, RSNL 1990*,  
5 Chapter P-47 (the “*Act*”), as amended, and  
6 regulations thereunder; and  
7

8 **IN THE MATTER OF** an application by  
9 Newfoundland and Labrador Hydro, pursuant  
10 to sections 58, 71 and 80 of the *Act*, for the  
11 approval of an economic test and deferral of  
12 Electrification, Conservation and Demand  
13 Management (“*ECDM*”) program costs in the  
14 proposed *ECDM Cost Deferral Account* for  
15 future recovery through the proposed *ECDM*  
16 *Cost Recovery Adjustment*; and  
17

18 **IN THE MATTER OF** an application by  
19 Newfoundland and Labrador Hydro, pursuant  
20 to section 41(3) of the *Act*, for the approval of  
21 supplemental 2021 capital expenditures related  
22 to the construction of an electric vehicle charging  
23 network.

---

**PUBLIC UTILITIES BOARD  
REQUESTS FOR INFORMATION**

**TC-PUB-NLH-001 to TC-PUB-NLH-004**

**Issued: February 16, 2022**

---

- 1 **TC-PUB-NLH-001** Further to PUB-NLH-046 please provide the net present value analysis and  
 2 the estimated rate mitigation benefit for the proposed electrification  
 3 program, including all components except incentives for EV purchases.  
 4
- 5 **TC-PUB-NLH-002** The Dunskey report states on page 30 that incentive programs could  
 6 accelerate adoption in the short-term, but have a limited long term impact  
 7 compared to infrastructure deployment and may not be a suitable approach  
 8 for intervention.  
 9
- 10 In response to PUB-NLH-004 Hydro stated that EV incentives are not  
 11 expected to be required over the longer term and incentives are effective in  
 12 overcoming barriers to the adoption of new technologies in this province.  
 13
- 14 (a) Please explain on what basis Hydro has chosen to adopt incentive  
 15 programs, even on a short term basis, when Dunskey has questioned  
 16 whether they are a suitable approach for intervention.  
 17
- 18 (b) Please provide further explanation addressing why Hydro has chosen  
 19 to adopt incentive programs when such incentives are already being  
 20 offered by the provincial and federal governments.  
 21
- 22 **TC-PUB-NLH-003** Page 31 of the Dunskey report, Figures 0-15 and 0-16 which show the  
 23 adoption projections and electricity sales impacts of a diversified \$20M  
 24 investment over 10 years to promote EV adoption in the province.  
 25
- 26 (a) Does the diversified \$20M diversified investment include incentives  
 27 as well? If investments other than DCFC are included, please provide  
 28 details of all investments that are included.  
 29
- 30 (b) If investments other than DCFC are not included in the \$20M  
 31 investment, please update Figure 0-15 and 0-16 for other elements of  
 32 the program such as incentives.  
 33
- 34 (c) If investments other than DCFC are not included in the modelled  
 35 \$20M investment, has Newfoundland Power analyzed whether  
 36 including incentives would impact the adopted projections and  
 37 electricity sales impacts and therefore, Hydro's calculation of rate  
 38 mitigation savings?  
 39
- 40 **TC-PUB-NLH-004** The Electrification Program included in the 2021 Electrification,  
 41 Conservation and Demand Management Application was presented for the  
 42 period 2021-2025.  
 43
- 44 (a) Significant time has passed since the filing of first Newfoundland  
 45 Power's application and then Hydro's application, which applications  
 46 have now been joined. Please update PUB-NLH-008, PUB-NLH-009,  
 47 PUB-NLH-018, and PUB-NLH-046, and any other tables/analysis  
 48 that may have been impacted as a result of this time passage.

1  
2  
3  
4  
5  
6  
7

(b) Are there any changes in the market since the filing of the Applications that would impact the information included in the Applications? For example, the increase of 14.7 cents per kWh included in the Provincial Government's recently announced rate mitigation plan and whether the amounts of the proposed EV incentives are still appropriate. Please include any market changes in the updates requested above.

**DATED** at St. John's, Newfoundland and Labrador, this 16<sup>th</sup> day of February, 2022.

**BOARD OF COMMISSIONERS OF PUBLIC UTILITIES**

Per

  
\_\_\_\_\_  
Cheryl Blundon  
Board Secretary