

1 Q. Please provide a detailed NPV calculation, by year and with all assumptions for units (# of  
2 vehicles by type, kW.h, kW, marginal costs, etc.) as well as dollars (for example, in the form of  
3 Technical Presentation slide 21) associated with each of the 4 scenarios shown on Table 1, Page  
4 12 of Schedule 3 of the Application.

5

6

7 A. Table 1 in the Electrification, Conservation and Demand Management Plan 2021–2025 (“2021  
8 Plan”) developed in partnership by Newfoundland Power Inc. and Newfoundland and Labrador  
9 Hydro (collectively, the “Utilities”) was sourced from the Newfoundland and Labrador 2020–  
10 2034 Conservation Potential Study (“Study”) produced by Dunsky Energy Consulting (“Dunsky”).<sup>1</sup>  
11 The specific table used from the Study to create Table 1 of the 2021 Plan was Table 0-3,<sup>2</sup> and  
12 serves to highlight the varying benefits between four different scenarios based on Dunsky’s  
13 analysis and methodologies. The Utilities would be required to engage Dunsky in order to  
14 provide the information requested as the specific calculations, models, and methodologies used  
15 to derive the tables, charts, and figures provided within the Study are owned by Dunsky. The  
16 information presented in slide 21 of the Technical Conference represents values associated with  
17 actual programs and initiatives proposed in the Utilities’ 2021 Plan.

---

<sup>1</sup> “Application for Approvals Required to Execute Programming Identified in the Electrification, Conservation and Demand Management Plan 2021–2025,” Newfoundland and Labrador Hydro, rev. 1, July 8, 2021 (originally filed June 16, 2021), sch. 3, p. 12.

<sup>2</sup> “Application for Approvals Required to Execute Programming Identified in the Electrification, Conservation and Demand Management Plan 2021–2025,” Newfoundland and Labrador Hydro, rev. 1, July 8, 2021 (originally filed June 16, 2021), sch. 3, sch. C p. 32 of 325, table 0-3.