

# Office of the Consumer Advocate

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October 1, 2025

## Via Email

The Board of Commissioners of Public Utilities  
Prince Charles Building  
120 Torbay Road, P.O. Box 21040  
St. John's, NL A1A 5B2

**Attention: Jo Galarneau**  
**Executive Director and Board Secretary**

Dear Ms. Galarneau:

**Re: Newfoundland Power Inc. - 2026 Capital Budget Application**  
**- Requests for Information CA-NP-094 to CA-NP-112**

Further to the above-captioned, enclosed are the Consumer Advocate's Requests for Information numbered CA-NP-094 to CA-NP-112.

If you have any questions regarding the enclosed, please contact the undersigned at your convenience.

Yours truly,



**Stephen Fitzgerald, KC**  
**Counsel for the Consumer Advocate**

Encl.  
/bb

cc  
**Newfoundland Power Inc.**  
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**IN THE MATTER OF** the *Public Utilities*  
*Act* (the "*Act*");

**AND**

**IN THE MATTER OF** an application by  
Newfoundland Power Inc. for an Order  
pursuant to sections 41 and 78 of the Act:  
(a) approving its 2026 Capital Budget; and  
(b) fixing and determining its 2024 rate base.

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**CONSUMER ADVOCATE  
REQUESTS FOR INFORMATION  
CA-NP-094 to CA-NP-112**

**Issued: October 1, 2025**

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- 1 CA-NP-094 (Reference CA-NP-046, CA-NP-049 and NLH-NP-001) NLH-NP-001  
 2 indicates that NP is considering options for deriving the data necessary to  
 3 calculate risk mitigation or reliability improvement values as part of its  
 4 ongoing asset management review.  
 5 a) Is the Asset Management Technology Replacement Project being  
 6 undertaken in an effort to better meet the requirements set out in the  
 7 Provisional Capital Budget Application Guidelines? Will it enable NP to  
 8 derive the data necessary to calculate risk mitigation and reliability  
 9 improvement values, and if so, when?  
 10 b) What customer benefits are expected from the Asset Management  
 11 Technology Replacement Project and when can customers expect to start  
 12 reaping those benefits?  
 13
- 14 CA-NP-095 (Reference CA-NP-054)  
 15 a) What purpose does the analysis in the AMI Update serve? Does NP  
 16 typically consider costs of a project while ignoring the benefits?  
 17 b) What costs would be avoided if smart meters were implemented? For  
 18 example, what meter reading costs and vehicle and support system costs  
 19 would be avoided with AMI technology?  
 20 c) Has NP ever undertaken a fulsome review of AMI (smart meters)? If so,  
 21 please identify the cost of the review and file the fulsome review.  
 22 d) Is it possible for NP to undertake a preliminary review of smart meters  
 23 identifying all costs and benefits prior to incurring the \$2.5 million cost of  
 24 a fulsome review, particularly when numerous other jurisdictions have  
 25 undertaken and published their reviews of AMI technology?  
 26 e) What studies are being advanced by NP that will "help quantify the  
 27 potential benefits of an AMI implementation"?  
 28 f) Is load shifting only one of numerous benefits of AMI? Could a  
 29 preliminary study of AMI be undertaken based on the numerous benefits  
 30 of AMI without detailed knowledge of load shifting potential?  
 31 g) Footnote 2 states "*Newfoundland Power estimates the cost of a fulsome  
 32 business case for AMI to be approximately \$2.5 million and would take  
 33 roughly 16 months to complete.*" Please provide the basis for this estimate  
 34 and timeline. Please cite examples of other "fulsome business cases" that  
 35 have been undertaken by NP showing the costs and time spent.  
 36
- 37 CA-NP-096 (Reference CA-NP-062) Please provide a lifetime cost comparison of wood  
 38 versus galvanized steel structures identifying capital, operation and  
 39 maintenance costs of each.  
 40
- 41 CA-NP-097 (Reference CA-NP-074a) It is stated "*The operating savings will be reflected  
 42 in Newfoundland Power's next GRA filing.*" Will the resulting savings be  
 43 verified post project completion, and will they be tracked and specifically  
 44 identified in the next GRA?

- 1 CA-NP-098 (Reference CA-NP-075a) The question asks, “*Has NP modified its customer*  
2 *survey to gain an understanding of customer willingness to pay for reliability*  
3 *improvements (balancing cost and reliability) as required in the development*  
4 *of the Strategic Plan directed by the Board in P.U. 3(2025), or does NP intend*  
5 *to use the results of Hydro's Digital Engagement Process?*” How does NP  
6 intend to gain an understanding of customer willingness to pay in its Strategic  
7 Plan?  
8
- 9 CA-NP-099 (Reference CA-NP-089) It is stated “*this arrangement would: (i) create*  
10 *additional energy that Hydro would need to export at the low marginal energy*  
11 *rate;*” Why did Hydro issue a Request for Expressions of Interest in July 2025  
12 for 500 GWh of firm energy and 150 MW of firm capacity on the IIS (CA-  
13 NP-036) if it would need to export this firm energy at the low marginal energy  
14 rate?  
15
- 16 CP-NP-100 (Reference PUB-NP-001) In its response, NP outlines actions it has taken in  
17 response to recommendations of the Climate Change Adaptation Plan. The  
18 actions primarily relate to grid design changes and grid resiliency.  
19 a) Are there any projects or programs in the 2026 CBA that reduce customer  
20 reliance on the grid?  
21 b) Does the Climate Change Adaptation Plan include any behind-the-meter  
22 or smart grid applications?  
23 c) Please file a copy of the Climate Change Adaptation Plan.  
24
- 25 CA-NP-101 (Reference PUB-NP-013) The RFI asks “*Has Newfoundland Power developed*  
26 *an integrated resource plan in conjunction with Newfoundland and Labrador*  
27 *Hydro regarding the necessity and requirements of these hydro plant*  
28 *refurbishments?*” The response states (page 3 of 3) “*it is not necessary for*  
29 *Newfoundland Power and Hydro to establish a separate integrated resource*  
30 *plan for Newfoundland Power’s hydro plants.*”  
31 a) The question asks if NP has developed an integrated resource plan **in**  
32 **conjunction with** Hydro. Has it?  
33 b) An integrated resource plan should consider all alternatives including smart  
34 grid applications, demand management, conservation, rate design, customer-  
35 owned generation and other behind-the-meter alternatives. Since NP is the  
36 primary distributor in the province, what smart grid applications and behind-  
37 the-meter alternatives, and amounts contributed, are included in NP’s 2026  
38 CBA and in Hydro’s Reliability and Resource Adequacy Study?  
39
- 40 CA-NP-102 (Reference NLH-NP-024)  
41 a) Are cloud-based technologies more prone to cyber security risks?  
42 b) Are cloud-based technologies more prone to weather-related risks?

CA-NP-103

(Reference NLH-NP-025) NP indicates that results of its customer surveys indicate that customers are in favour of the Correspondence Modernization project.

- a) What details of the Customer Correspondence Modernization project were made available to customers? For example, were customers made aware of the cost of the project and its impact on customer bills? If so, please provide supporting documentation.
- b) The survey appears to indicate (Attachment A, page 7 of 24, B2) that 82% of residential customers and 86% of business customers rate satisfaction with the current bill design at 7 out of 10, or above. What parts of the customer survey led NP to conclude that customers are in favour of the Customer Correspondence Modernization project?
- c) If customers have the knowledge to indicate they are in favour of the Customer Correspondence Modernization project, would they not also have the knowledge to respond to a question about their willingness to pay for improved reliability? For example, does NP believe that customers have the knowledge to respond to the following question: Are you willing to pay higher bills in exchange for increased reliability?

CA-NP-104

(Reference CA-NP-039) With respect to NP's Hydro plants:

- a) Of expenditures on replacements due to in-service failures listed in Table 1, how much were on (i) the Victoria hydro facility and (ii) the Topsail hydro facility?
- b) Attachment A shows that from August 2022 to June 2025, with the exception of 0.038 GWh in February 2023, there was no monthly generation at the Victoria plant. (i) Please explain why the facility has not operated and whether it will operate prior to NP's planned refurbishment in 2027/28 (2026 Capital Budget Overview, Appendix B, page 1). (ii) Please provide a table of annual capital expenditures and operating/maintenance costs as well as generation for the Victoria facility for 2010 to 2026F. (iii) What is the capacity of the Victoria plant?
- c) Attachment A shows that from July 2023 to May 2025 there was no monthly generation at Topsail and only 0.006 GWh in June of 2025. (i) Please explain why the facility has not operated and when it will be returned to service. (ii) Please provide a table of annual capital expenditures and operating/maintenance costs as well as generation for the Topsail facility for 2010 to 2026F. (iii) What is the capacity of the Topsail plant?

CA-NP-105

(Reference CA-NP-042) With respect to the Mount Carmel Pond Dam Fibre:

- a) What is the purpose of adjusting the outlet gate's position?
- b) In recent years, how, and by whom, was it decided when the gate position should be adjusted?

- c) How many times in 2024 was staff sent to the facility to adjust the outlet gate's position?
- d) What is the estimated labour and related costs for a single staff trip to the site to adjust the outlet gate?
- e) How does the Distribution Feeder CAB-01 Extension project relate to the Mount Carmel Pond Dam Fibre project? Are each necessary for the other?
- f) In its 2025 CBA, (Mount Carmel Pond Dam Refurbishment, page 12), NP indicated that its preferred alternative involved "*replacing the Mount Carmel Pond spillway structure and automating the outlet gate in 2025 and 2026 for an estimated capital cost of \$4,616,000.*" and (footnote 11) indicated that additional projects would be requested in 2026 CBA to allow for "*full automation.*" Please clarify how much automation will be achieved from the work approved by the Board in the 2025 CBA for the Refurbishment project and what "full automation entails.
- g) Would foregoing the Mount Carmel Pond Dam Fibre project, at \$150,000, and the Distribution Feeder CAB-01 Extension project, at \$1.346 million, reduce the NP's estimate of the benefits of the Mount Carmel Pond Dam Refurbishment given in NP's 2025 CBA?

CA-NP-106

(Reference CA-NP-073 Attachment A) In the NPV analysis for the Transmission Line 100L Rebuild, would a discount rate of 9 per cent change the ranking of the alternatives? Please provide the calculations.

CA-NP-107

(Reference CA-NP-23) It is indicated that through implementation of the LED Street Lighting Replacement project "*opportunities to address other deficiencies are evaluated during the replacement of an HPS street light fixture with an LED street light fixture. If feasible, the responding crew will make the repairs during the same site visit as the street light replacement.*" Yet, there does not seem to be a decline in the number of Street Light Trouble Calls (CA-NP-024, Table 1).

- a) Does NP expect that with completion of the LED Street Lighting Replacement Project, and the addressing of deficiencies found during that process, that the number of street light trouble calls will not decline? Why?
- b) Why is NP forecasting constant inflation-adjusted expenditure on its Replacement Street Lighting program rather than a decline (Application, Schedule B, page 40, Figure 1) over 2025 to 2030?

CA-NP-108

(Reference CA-NP-004) Please extend the table to include 2025F to 2030F.

CA-NP-109

(Reference CA-NP-026) Regarding the Extensions program:

- a) NP states that it "*does not record customer contributions as being part of a specific capital program.*" (i) Why not? (ii) In Schedule B, page 11, footnotes 2, 4 and 5 give amounts of CIAC related to Extensions; please

reconcile with the statement that NP does not record customer contributions in relation to specific programs.

- b) In light of the fact that the proposed 2026 expenditure on this program is \$16.7 million, and the Application (paragraph 3) includes an estimated \$2.5 in total CIAC, is it fair to say that capital contributions from those who request line extensions will be less than 15% of the total capital cost in 2026?

CA-NP-110

(Reference CA-NP-029) Regarding the Relocate/Replace Distribution Lines for Third Parties program:

- a) Please confirm that all expenditure through this program is due to third party requests and that each such party makes a contribution to the work it requested.
- b) What is the rationale for not charging each party the full capital cost of the capital work requested?
- c) For future inquiry, will NP begin recording the contributions from third parties for work through this program?

CA-NP-111

(Reference CA-NP-031) NP states that the New Services program *“involves the installation of service wires to connect new customers to the electrical distribution system. In general, these installation costs are within the definition of the Company’s basic investment, as outlined in its Residential and General Service CIAC Policies, requiring no contribution from the customer towards the capital cost.”*

What is the rationale for not requiring even a minimal capital contribution for new service even if it is within the company’s definition of basic investment?

CA-NP-112

(Reference CA-NP-032) For the New Street Lighting program it is stated *“Capital expenditures related to the New Street Lighting program are indirectly recovered through customer rates.”* What is the rationale for not requiring an initial capital contribution commensurate with each request?

**DATED** at St. John’s, Newfoundland and Labrador, this 1<sup>st</sup> day of October, 2025.

Per: 

**Stephen Fitzgerald, KC**

**Counsel for the Consumer Advocate**

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