**Q. (Reference 4.1 - Customer Correspondence Modernization) It is stated (page 5) "*Of the utilities surveyed, 80 percent had either replaced their bill design solution in the past five years or were planning to do so within the next two to three years*."**
**a) Is 80% a significant figure?**
**b) Is there a link to smart meters? It is understood that 89%, or 8 of the other nine Canadian provinces have, or are in the process of, installing smart meters (AMI technology).**
**c) How many of the utilities surveyed have either implemented AMI in the past five years or are planning to do so within the next five years?**
**d) Would it be more economic to modernize customer correspondence in conjunction with, and at the same time as, the introduction of smart meters?**

**A.** a) Newfoundland Power considers the fact that approximately 80 percent of the utilities surveyed had either replaced their bill design solution in the past five years or were planning to do so within the next two to three years as indicative that the Company's planned approach to bill design and delivery aligns with industry best practice.

b) There is no direct link between the customer correspondence modernization ("CCM") and Advanced Metering Infrastructure ("AMI") technology.

While AMI can enable more granular usage data and potentially support enhanced customer insights, the CCM Project is focused on modernizing how the Company communicates with customers, particularly through bill design. The implementation of the CCM Project does not depend on the deployment of AMI technology.

With respect to AMI adoption in other Canadian provinces, Newfoundland Power completed a jurisdictional scan of 20 utilities across Canada with respect to their metering practices. That scan found that seven utilities have implemented AMI, and another five are currently transitioning from automated meter reading ("AMR") to AMI.[1] The remaining eight utilities continue to use AMR, electromechanical meters, or a combination of those technologies.[2]

c) Newfoundland Power has not specifically surveyed the utilities on their adoption of AMI technology relative to their modernization of customer correspondence solutions. The purpose of the survey conducted by the Company, in partnership with Electricity Canada, was to assess industry practice regarding bill design solutions.

d) No, there are no meaningful efficiencies to be gained by undertaking the CCM Project in conjunction with AMI deployment.

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[1] Of the seven utilities that have implemented AMI, one of those utilities is transitioning from powerline carrier AMI to AMI.

[2] For the results of the jurisdictional scan completed by Newfoundland Power, see Attachment A to the AMI Update filed as part of the Company's *2026 Capital Budget Application* (the "AMI Update").

Maintaining the Company's existing customer correspondence solution presents several long-term risks and limitations, with the primary concern being an increased risk of obsolescence and reduced supportability.[3] Modernizing the current customer correspondence solution has been demonstrated to be least-cost, offering the greatest value to customers while enhancing operational efficiency and communication capabilities.[4]

[3] While adoption rates of AMI in electrical utilities have increased, Newfoundland Power notes that AMR and its predecessor technology, electromechanical metering, are both still used by Canadian electrical utilities. See page 2 of the AMI Update. See also *Newfoundland Power Rebuttal Evidence, 4.6 – Advanced Metering Infrastructure,* filed as part of Newfoundland Power's *2025/2026 General Rate Application.*

[4] See report *4.1 Customer Correspondence Modernization* filed as part of the Company's *2026 Capital Budget Application,* page 6 and Appendix A.