Q. (Reference PUB-NP-040 pertaining to NP's 2025 CBA) New Brunswick Power filed evidence with the New Brunswick Energy and Utilities Board on August 1, 2019 entitled "Advanced Metering Infrastructure Capital Project (https://www.nbpower.com/media/1489724/nbp0103.pdf) which states (page 5) "*The pace of technological change has been increasing and will continue to increase. NB Power believes that continuing to plan on the basis of making investments in traditional utility assets in the face of such change may not be prudent and reasonable*." Further, Nova Scotia Power states on its website (https://www.nspower.ca/cleanandgreen/innovation/smart-grid-nova-scotia) "*Globally, the electrical grids that have served us over the past century are evolving through new technology into "smart grids. " Smart grids offer a future in which individual pieces of the electrical system - including "smart devices" in customers' homes and businesses - can communicate with one another, so that the entire electrical system works together to use energy more efficiently. This means lower overall costs for customers and a cleaner environment*."

a) Please file documentation produced by, or on behalf of, NP that supports or refutes these statements.

b) In the past 5 years, what has NP done to make its grid smarter so that the entire electrical system works together to use energy more efficiently?

A. a) Newfoundland Power notes that this Request for Information ("RFI") is identical to part a) of RFI CA-NP-246 filed in relation to the Company's *2025 Capital Budget Application*.

See part b) of this response for further information on how Newfoundland Power enables the "smart" and efficient operation of its electrical system.

For an update on the Company's review of Advanced Metering Infrastructure ("AMI"), see Newfoundland Power's AMI Update, filed as part of the Company's *2026 Capital Budget Application* in accordance with Order No. P.U. 3 (2025).[1]

In addition, the Company notes that the deployment and realized benefits of AMI projects vary by situation and jurisdiction-specific factors such as the age and type of its existing metering technology, government mandates and funding opportunities, as well as other anticipated benefits.[2] Newfoundland Power observes the following regarding the timing of Nova Scotia Power Inc.'s ("Nova Scotia Power") and New Brunswick Power Corporation's ("New Brunswick Power") AMI projects:

[1] See Newfoundland Power's *2026 Capital Budget Application, 2026-2030 Capital Plan, Appendix B: AMI Update.*
[2] *Ibid., Section 3.1 Jurisdictional Scan*.

- Nova Scotia Power applied to the Nova Scotia Utility and Review Board for an AMI project when their existing electromechanical meters were nearing the end of expected life and were due to be replaced in mass quantities.[3] Nova Scotia Power stated that automating its meter reading functions would provide annual savings of $4.6 million.[4]

- At the time New Brunswick Power applied to the New Brunswick Energy and Utilities Board, 28% of its meters were electromechanical.[5] The remaining 72% of its meters were Advanced Meter Reading ("AMR"), which were upwards of 15 years old at the time of its filing.[6] New Brunswick Power estimated that its AMI implementation would reduce the 55 staff required in meter services from 55 Full-time Equivalents ("FTEs") to 10 FTEs.[7]

Newfoundland Power's current circumstances are different than those of Nova Scotia Power and New Brunswick Power at the time of their AMI implementations.[8] Newfoundland Power does not have any electromechanical meters in service. Newfoundland Power's implementation of AMR took place between 2013 and 2018.[9] AMR eliminated the need for manual reading processes, reducing meter reading costs by nearly 80%, providing low-cost metering for customers over the past decade.[10] In 2024, the Company's annual meter reading costs were $0.6 million, reflecting approximately 6 FTEs.[11]

As provided in the AMI Update, the Company's AMR technology will require mass replacement in the mid-2030s.[12] Based on current Canadian utility practice, Newfoundland Power anticipates that transitioning to AMI at that time will be a reasonable alternative to re-investing in AMR technology, absent government funding that could enable an adoption of AMI in the shorter term.[13]

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3 *Nova Scotia Power Inc., CI 47124 - Advanced Meter Infrastructure*, October 19, 2017, page 24. With respect to the replacement of its electromechanical meters, Nova Scotia Power stated, *"given that many of these meters are at or close to the end of their useful life and will need to be replaced in any event, this is the right time to adopt AMI."*

4 *Ibid.,* pages 23-24.

5 *New Brunswick Power Corporation, Advanced Metering Infrastructure Capital Project*, August 1, 2019, pages 11-12.

6 *Ibid.*

7 *Ibid.,* page 26.

8 Newfoundland Power also observes that Maritime Electric Company Limited ("Maritime Electric") implemented AMR meters in 2005 before applying to the Prince Edward Island Regulatory and Appeals Commission (the "Commission") to implement AMI meters beginning in 2024, representing an in-service period of 19 years. Further, Maritime Electric received $19 million in federal funding, offsetting the AMI project costs of $38.6 million by almost 50% to support its transition to AMI technology at that time. See *Commission Order UE24-06.*

9 The average age of Newfoundland Power's AMR meter fleet is an estimated ten years.

10 Newfoundland Power estimates that the implementation of AMR meters has resulted in lower meter reading costs of approximately $28 million over the 2013 to 2024 timeframe. See *Newfoundland Power's 2026 Capital Budget Application, 2026-2030 Capital Plan, Appendix B: AMI Update, Section 2.0 Current Metering Technology.*

11 *Ibid.*

12 *Ibid., Section 1.0 Introduction.*

13 *Ibid.*

b) Newfoundland Power notes that this RFI is substantially similar to part b) of RFI CA-NP-246 filed in relation to the Company's *2025 Capital Budget Application*.

The Company enables the "smart" and efficient operation of its electrical system through operational technologies and electrical system automation. Specific examples include:

- Newfoundland Power's Distribution Feeder Automation project, which involves increasing automation of the distribution system through the installation of downline reclosers.[14] During Hurricane Larry, the automatic operation of downline reclosers avoided 3.8 million customer outage minutes.[15]

- The Company's Business Modernization initiative, which enables the Company to leverage new and/or existing technology to help streamline business processes in Operations, Technology, and Customer Relations.[16]

- Newfoundland Power's Outage Management System automatically assesses multiple individual outage reports and groups them into single events using pre-determined logic. This enables timely restoration of service to customers experiencing outages.[17]

- The Company's Geographic Information System was expanded to provide accurate location-related information for electrical system assets, such as street lights. This reduces duplicate reports of street light outages allowing the Company to optimize field operations.[18]

Further actions taken by Newfoundland Power to maintain overall efficient service delivery to customers can be found in the responses to RFIs PUB-NP-017, PUB-NP-023, and PUB-NP-036 filed as part of the Company's *2025/2026 General Rate Application.*

[14] See Newfoundland Power's *2025/2026 General Rate Application, Section 2: Customer Operations*, page 2-23.
[15] See Newfoundland Power's *2025 Capital Budget Application, Schedule B – 2025 Capital Projects and Programs – Over $750,000,* page 15.
[16] See Newfoundland Power's *2025/2026 General Rate Application, Section 2: Customer Operations*, page 2-23.
[17] *Ibid.*
[18] *Ibid.,* page 2-28.