

January 16, 2026

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

Attention: Jo-Anne Galarneau
Executive Director and Board Secretary

Dear Ms. Galarneau:

Re: Consumer Advocate Correspondence Regarding November 2025 Billing – Newfoundland Power Comments

Newfoundland Power recognizes that managing higher bills with the onset of winter can be difficult for many customers, especially with increases in other costs of living. As detailed below, the Company has implemented a number of measures to assist customers.

On March 6, 2025, the Board of Commissioners of Public Utilities (the "Board") directed Newfoundland Power (the "Company") to review the accuracy of meter readings and customer energy usage and to report to the Board on, among other things, measures employed to ensure billing accuracy and to minimize billing volatility. On March 21, 2025, Newfoundland Power reported to the Board on the results of the 2025 Customer Billing Review (the "*2025 Customer Billing Review Report*").

On December 18, 2025, the Consumer Advocate wrote to the Board stating that the Consumer Advocate's Office had received complaints from customers regarding their electricity bills from November 2025. Notwithstanding the results of the 2025 Customer Billing Review, the Consumer Advocate requested "*a full review of Newfoundland Power's November billing practices and a full assessment of Newfoundland Power's meters*" (the "Consumer Advocate's Request").

During every winter season, a portion of customer contacts at Newfoundland Power include customer concerns about winter electricity bills. Newfoundland Power understands that energy costs can present a challenge for its customers, particularly during the winter heating season. Temperatures from November to December 2025 dropped by 5-6 degrees across the Company's service territory, combined with an approximate 15% increase in wind speeds. In December and January to date, the Company's service territory also experienced a number of significant wind events.

As outlined in the *2025 Customer Billing Review Report*, Measurement Canada is the Federal Government agency that ensures accuracy in the sale of measured goods such as electricity. Newfoundland Power's meters are certified by Measurement Canada, which requires that public

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utilities regularly test their meters to ensure accuracy.¹ As part of the 2025 Customer Billing Review, Newfoundland Power conducted a full review of testing results of nearly 5,000 meters tested since 2018 in an independent Measurement Canada-accredited facility. Newfoundland Power meters were found to be 99.9% accurate, exceeding the standard of 97% accuracy set by Measurement Canada. Zero meters failed the testing due to accuracy and no anomalies were identified with meter readings.² In 2025, another 1,373 Newfoundland Power meters were subject to compliance testing. Again, the meters were found to be 99.9% accurate. The implementation of Advanced Metering Infrastructure ("AMI") would therefore not improve the accuracy of electricity metering and, as shown in the *2025 AMI Update*, would not be least cost for customers at this time.³

Since the completion of the 2025 Customer Billing Review, Newfoundland Power has taken additional steps to assist customers in understanding the dynamics of winter energy usage and to reduce the volatility of monthly billing. These additional steps include a dedicated website banner with efficiency tips and information to improve customer understanding of winter energy use⁴, email usage alerts for customers notifying them when their consumption is higher than normal, additional specialized training for employees to address customer concerns, development of an interactive home heat-loss calculator accessible on the takeCHARGE website, and Power Connection bill inserts that provide efficiency tips and inform customers how they can be ready for winter electricity bills. This includes information on available takeCHARGE rebates that can help customers reduce their winter energy consumption.

Newfoundland Power has also worked to optimize customer billing days to reduce variation in the number of days in each billing period, particularly during winter. In its direct customer outreach, Newfoundland Power has emphasized its Equal Payment Plan ("EPP") option, which keeps electricity bills consistent every month and therefore virtually eliminates bill volatility in the winter and makes budgeting easier.⁵

Newfoundland Power encourages the Consumer Advocate to forward all customer inquiries directly to Newfoundland Power. Newfoundland Power's customer service representatives

¹ Sampling and replacement requirements are governed by Compliance Sampling Orders ("CSOs") and Government Retest Orders ("GROs") issued in accordance with regulations under the *Electricity and Gas Inspection Act (Canada)*.

² In Canada, the AMR metering technology used by Newfoundland Power is also used by Newfoundland and Labrador Hydro, Manitoba Hydro, Naka Power in the City of Yellowknife, Yukon Energy Corporation, ATCO Electric Yukon, Northwest Territories Power Corporation, and Qulliq Energy Corporation. See Newfoundland Power's *2026 Capital Budget Application*, 2026-2030 Capital Plan, Appendix B – *2025 AMI Update*, Attachment A.

³ See Newfoundland Power's *2026 Capital Budget Application*, 2026-2030 Capital Plan, Appendix B – *2025 AMI Update*, Attachment A.

⁴ Newfoundland Power has updated its website and educational materials for greater clarity and ease of understanding and enhanced customer education to explain the impacts of transitioning heating systems from oil to electric.

⁵ The Company has increased participation in the EPP by approximately 1,900 customers over the last year. Under the EPP, monthly bill payments are averaged out over 12 months, making it easier to manage the higher and lower energy consumption from season to season. Newfoundland Power has promoted EPP through a multi-channel approach, including streamlined one-click sign-up, targeted email campaigns, bill messaging across multiple cycles, bill inserts, and social media outreach.

("CSRs") have specialized training to assist customers with their electricity bills. When customers contact Newfoundland Power directly, Newfoundland Power is able to examine each customer's particular bill, the dynamics of their particular energy consumption, and to offer options to mitigate the challenges associated with winter billings, including the possibility of individualized payment arrangements. Newfoundland Power's Customer Contact Centre has achieved a 96.3% first call resolution rate for high-bill calls, indicative of its effective customer service.⁶

Newfoundland Power recognizes that winter bills can be a challenge for customers and has put in place a number of measures to better assist customers with their winter bills. Customers with higher than expected bills are encouraged to contact Newfoundland Power's trained CSRs directly for personalized service. This will enable the Company to better assist customers throughout this winter season.

Yours truly,



Dominic Foley
Legal Counsel

Enclosures

cc. Shirley Walsh
Newfoundland and Labrador Hydro

Dennis Browne, K.C.
Browne Fitzgerald Morgan & Avis

⁶ In Q4 2025, customers who were assisted by a CSR gave an average satisfaction rating of 90.8%.

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