

1 Q. **Reference: Schedule 1 – Evidence, page 2**

2 It is stated “As the 2021 Plan was jointly developed and will be jointly executed by the two  
3 utilities, Hydro is also seeking approval to use a Modified Total Resource Cost test (“mTRC”) for  
4 the economic evaluation of customer electrification programs.”

5 a) Please confirm that Newfoundland Power’s ECDM program has not received Board  
6 approval.

7 b) What are Hydro’s plans if the Board does not approve Newfoundland Power’s proposed  
8 ECDM program, or approves it with modifications causing Newfoundland Power to modify  
9 or abandon its proposed ECDM program? For example, if Newfoundland Power abandons its  
10 charging station program would Hydro enlist the services of the private sector to fill the void  
11 through capital incentives to construct and own charging stations?

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14 A. a) Newfoundland Power Inc. (“Newfoundland Power”) filed its 2021 Electrification,  
15 Conservation and Demand Management application with the Board of Commissioners of  
16 Public Utilities (“Board”) on December 16, 2020. As of the date of this response, the Board  
17 had not issued an Order in response to Newfoundland Power’s application.

18 b) Newfoundland and Labrador Hydro (“Hydro”) and Newfoundland Power have prepared a  
19 joint Electrification, Conservation and Demand Management Plan to be delivered under the  
20 takeCHARGE partnership. As such, Hydro expects that any approvals or modifications as  
21 directed by the Board will apply to both Hydro and Newfoundland Power.

22 Hydro has no reason to believe that Newfoundland Power will abandon its charging station  
23 program. With respect to potential private investment in public fast charging infrastructure,  
24 the plan proposed by both Hydro and Newfoundland Power includes a proposed make-  
25 ready model which provides support to non-utility entities to encourage investment in  
26 public charging infrastructure.

1           As noted in Hydro’s application:

2                           Currently, the business case for private investment in DCFC charging stations is  
3                           weak. This indicates that DCFC deployment in the province will be limited in the  
4                           absence of utility or government intervention. Through appropriate investment,  
5                           utility involvement can accelerate electrification of the transportation sector.

6                           The 2021 Plan includes charging infrastructure support through two utility  
7                           investment models: (i) the make-ready model; and (ii) the utility charging  
8                           network investment model.

9                           The make-ready model includes the installation of electrical infrastructure to  
10                           enable customers to purchase and install DCFC. The costs to get a site ready for  
11                           charger installation are typically a large percentage of the capital required for an  
12                           installation, at approximately 30% to 40%. This model lowers upfront capital  
13                           costs which, in turn, improves the business case for commercial customers  
14                           when installing, owning and operating EV charging stations.<sup>1</sup>

15                          Hydro notes that the proposed make-ready model is in addition to utility investment in  
16                          charging infrastructure.

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<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. 15.