

1 Q. **Reference: Programs and Projects Under \$750,000, page 1, Install Electric Vehicle Chargers**  
2 **(2025-2026) – Hydro Sites.**

3 Hydro states it intends to install twenty Level 2 electric vehicle (“EV”) chargers at six Hydro-  
4 owned sites across the province.

5 a) How many EVs and Level 2 EV chargers are currently at each of the Hydro sites?

6 b) Is it Hydro’s plan to include the capital expenditures for the EV chargers in capital assets,  
7 and subsequently, in rate base? Or, does Hydro plan to include the chargers in the  
8 Electrification Cost Deferral Account for future recovery? Please explain.

9 c) In Order P.U. 30(2021), at page 13, the Board stated “In future years the utilities will  
10 have to demonstrate that further capital expenditures for additional EV charging  
11 stations are justified in the circumstances.”

12 i. How are the proposed EV chargers justified to be used and useful for the  
13 purpose of including in rate base?

14 ii. Will the proposed chargers be available for public use?

15

16

17 A. a) By the end of 2024, Newfoundland and Labrador Hydro (“Hydro”) expects to have 10  
18 electric vehicles (“EV”) in its fleet and 23 Level 2 charging plugs. The proposed expansion of  
19 fleet charging infrastructure will allow Hydro to continue to grow the number of EVs in its  
20 fleet. The chargers proposed under this project are intended for Hydro fleet use and not  
21 public use.

22 b) It is Hydro’s intent to include these chargers in its capital assets and subsequently in the rate  
23 base. This is consistent with the approach taken when Hydro last received approval from the  
24 Board of Commissioners of Public Utilities (“Board”) to install fleet (Level 2) chargers.<sup>1</sup>

---

<sup>1</sup> Board Order No. P.U. 2(2021).

1 Board Order No. P.U. 30(2021), was in response to Hydro’s electrification application  
2 seeking approval of the construction of Direct Current Fast Chargers (“DCFC”) for public use  
3 to promote public transportation electrification across the province.<sup>2</sup> The fleet chargers  
4 proposed in Hydro’s 2025 Capital Budget Application are not intended for public use, but  
5 rather to support Hydro’s internal fleet of EVs, and are therefore distinctly different from  
6 DCFCs. Hydro’s Electrification Cost Deferral Account, as approved in Board Order No.  
7 P.U. 33(2023), specifically excludes electrification expenditures that are general in nature  
8 and not associated with a specific electrification program. As such, Hydro did not consider  
9 the deferral of costs associated with internal fleet electrification to be in accordance with  
10 the approved definition of the Electrification Cost Deferral Account, or the Board’s direction  
11 in Order No. P.U. (30)2021.

12 c) The proposed chargers are intended for Hydro’s internal fleet use and represent a required  
13 investment to permit the purchase of additional fleet EVs. Fleet EVs provide operational  
14 savings when compared to internal combustion alternatives, produce less emissions than  
15 internal combustion vehicles, and are required to gain operational experience in advance of  
16 the Government of Canada’s Electric Vehicle Availability Standard, which will require 100%  
17 of all new vehicle sales to be zero-emission by 2035.

18 The continued integration of EVs into Hydro’s fleet and associated investments are  
19 therefore consistent with Hydro’s obligation under section 3(b)(iii) of the *Electrical Power*  
20 *Control Act, 1994*<sup>3</sup> to deliver power to customers at the lowest possible cost, in an  
21 environmentally responsible manner, consistent with reliable service. In Hydro’s view, such  
22 costs would be prudently incurred in the provision of service to customers and therefore,  
23 should be included in the rate base as used and useful assets in accordance with section 64  
24 of the *Public Utilities Act*.<sup>4</sup>

---

<sup>2</sup> Board Order No. P.U. 30(2021), p. 10/13–15.

<sup>3</sup> *Electrical Power Control Act, 1994*, SNL 1994, c E-5.1, s 3(b)(iii).

<sup>4</sup> *Public Utilities Act*, RSNL 1990, c P-47, s 64.