

WHENEVER. WHEREVER.
We'll be there.



HAND DELIVERED

February 21, 2019

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

Attention: G. Cheryl Blundon
Director of Corporate Services
and Board Secretary

Dear Ms. Blundon:

Re: Request for Amendment to Order No. P.U. 2 (2019) – LED Street and Area Lighting

A. Introduction

On January 24, 2019, the Board issued Order No. P.U. 2 (2019) approving, among other things, Newfoundland Power's *Schedule of Rates, Tolls and Charges* to become effective for all electrical consumption on and after March 1, 2019. Since the issuance of the Order, the Company has become aware of a minor issue relating to the description of Light Emitting Diode ("LED") fixtures under *Rate #4.1 Street and Area Lighting Service*.

While the issue does not affect the type of service to be provided or the rates to be charged to customers, the Company is requesting an amendment to Schedule A of Order No. P.U. 2 (2019) to avoid any potential confusion among customers.

B. Description of Issue

The requested amendment relates to the "lumens" described for different types of LED fixtures. This can be found in Order No. P.U. 2 (2019), Schedule A, page 6 of 12, a copy of which is provided as Attachment A to this correspondence.

"Lumens" is a technical term used to measure lighting output. The amount of lumens emitted by LED fixtures is different than that emitted by High Pressure Sodium ("HPS") fixtures. This is primarily because HPS fixtures emit a broad lighting pattern that results in wasted light spilling onto

Newfoundland Power Inc.

55 Kenmount Road • P.O. Box 8910 • St. John's, NL A1B 3P6

PHONE (709) 737-5364 • FAX (709) 737-2974 • khopkins@newfoundlandpower.com

areas not intended to be lit, such as the night sky. LED fixtures, on the other hand, are more directional and allow the light to be targeted to specific areas, which reduces the amount of wasted light. As a result, in comparison to HPS fixtures, LED fixtures can provide the same amount of “useful” lighting to customers at a lower number of lumens. This is one of the reasons LED fixtures are more efficient and cost-effective for customers.

The lumen ranges presently described for each LED fixture in *Rate #4.1 Street and Area Lighting Service* were prepared in an attempt to account for the differences in lighting technology. However, it has become clear to Newfoundland Power that these ranges are not reflective of the actual lumen output provided by LED fixtures. The actual lumen output for LED fixtures will be lower than the stated ranges.

Additionally, the actual lumen output of LED fixtures varies among manufacturers and may change over time as the technology continues to evolve. This is not the case for HPS fixtures, which is a more mature technology that tends to be the same regardless of manufacturer.

C. Requested Amendment

Pursuant to Section 76 of the *Public Utilities Act*, Newfoundland Power requests that the Board amend Schedule A of Order No. P.U. 2 (2019) to delete the ranges of lumens described for each category of LED fixtures. Attachment A to this correspondence provides the relevant section of Schedule A with the requested deletions made and the remaining text shaded in gray.

Yours very truly,



Kelly Hopkins
Corporate Counsel

Enclosures

c. Dennis Browne, QC
Consumer Advocate

Mark Murray
IBEW, Local 1620

Newfoundland Power Inc.

55 Kenmount Road • P.O. Box 8910 • St. John's, NL A1B 3P6

PHONE (709) 737-5364 • FAX (709) 737-2974 • khopkins@newfoundlandpower.com

Order No. P.U. 2 (2019), Schedule A, Page 6 of 12

NEWFOUNDLAND POWER INC.
RATE #4.1
STREET AND AREA LIGHTING SERVICE

Availability:

For Street and Area Lighting Service where the electricity is supplied by the Company and all fixtures, wiring and controls are provided, owned and maintained by the Company.

Monthly Rate: (Includes Municipal Tax and Rate Stabilization Adjustments)

	Sentinel/Standard	Post Top
High Pressure Sodium		
100W (8,600 lumens)	\$17.46	\$18.84
150W (14,400 lumens)	21.53	-
250W (23,200 lumens)	29.93	-
400W (45,000 lumens)	41.06	-
Light Emitting Diode		
LED 100	\$15.77	-
LED 150	17.25	-
LED 250	22.12	-
LED 400	25.10	-

Special poles used exclusively for lighting service*

Wood	\$6.28
30' Concrete or Metal, direct buried	8.97
45' Concrete or Metal, direct buried	14.69
25' Concrete or Metal, Post Top, direct buried	6.68

Underground Wiring (per run)*

All sizes and types of fixtures	\$15.31
---------------------------------	---------

* Where a pole or underground wiring run serves two fixtures paid for by different parties, the above rates for such poles and underground wiring may be shared equally between the two parties.

General:

Details regarding conditions of service are provided in the Rules and Regulations. **This rate does not include the Harmonized Sales Tax (HST) which applies to electricity bills.**