Q. (Reference CA-NP-49(b)) It is stated "It is confirmed that Newfoundland Power's 1 2 AMR meters are not capable of the interval metering necessary to support time-of-3 use rates." 4 a) Has Newfoundland Power considered use of load profiling with its AMR 5 technology in lieu of procuring and installing a costly AMI system? 6 Does Newfoundland Power have the load research data necessary to develop b) 7 load profiles, or would it have to wait until completion of a detailed load 8 research study? 9 What would it cost to offer TOU rates under a load profiling scenario? c) Could Newfoundland Power obtain such load profile information in the 10 d) marketplace, and if so, at what cost? 11 12 13 A. No. Advanced metering infrastructure is necessary to appropriately bill a) 14 customers under a time-of-use customer rate offering. 1 15 16 b) See part (c) to response to Request for Information CA-NP-182. 17 18 See part (a). c) 19 20 See part (a). d)

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While Newfoundland Power has a variety of load research data that could be used to create standard load shapes to develop time-of-use rates, the load shapes would not be appropriate for use in billing customers fair and just customer rates.