

- 1 **Q. (Reference CA-NP-016a)**
 2 **It is stated "There are no capital expenditures associated with Advanced**
 3 **Metering Infrastructure ("AMI") included in Newfoundland Power's 2025**
 4 **Capital Budget Application."**
 5 **a) How much capital is NP forecasting in its 2025 CBA for the New Meters**
 6 **and Replacement Meters programs in each year from 2025 through 2030?**
 7 **Please identify the basis for the forecast including number of meters,**
 8 **types of meters, and unit cost.**
 9 **b) Are these metering programs mandatory? If so, please file a copy of the**
 10 **document that mandates the metering programs.**
 11 **c) Please file the clauses in NP's existing regulations relating to metering.**
 12 **d) Is it mandated that NP provide AMR meters? If so, please provide the**
 13 **relevant documentation.**
 14 **e) Did NP consider alternatives to AMR meters? If so, please provide the**
 15 **analysis that NP relied upon to select AMR metering.**
 16 **f) Is there anything in legislation or NP's policies that preclude the**
 17 **application of evolving technologies and processes relating to metering as**
 18 **they become available?**
 19
 20 **A. a) Newfoundland Power forecasted its *New Meters* and *Replacement Meters* programs**
 21 **in the 2025-2029 Capital Plan. See Table 1 below. Newfoundland Power has not**
 22 **completed forecast calculations for 2030.**

Table 1: New Meters and Replacement Meters Forecast (\$000s)					
	2025F	2026F	2027F	2028F	2029F
Program					
New Meters	457	448	904	865	774
Replacement Meters	648	573	1,223	1,217	1,150

23 The *New Meters* and *Replacement Meters* programs forecast are based on the
 24 number of meters required per year and the inflation adjusted unit cost per meter.
 25 The quantities of meters required for the *New Meters* program are estimated using
 26 Gross Customer Connections forecast 2025-2029. This is calculated based on the
 27 Conference Board of Canada's ("CBOC") forecast of housing starts and completions
 28 from its medium-term outlook, together with a three-year average of the historical
 29 pattern between customer connections and housing starts and completions. This
 30 approach combines the CBOC's outlook with the Company's historical data to
 31 calculate the forecast number of new customer connections.

32
 33 The quantities of meters required for the *Replacement Meters* program are
 34 estimated using a combination of requirements set forth in in the *Electricity and Gas*

1 *Inspections Act* and historical averages of replacement meters required due to
2 premature failure of meters in service.

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4 b) The requirement to meter most electrical service is mandated by section 2(c) of the
5 Company's *Schedule of Rates, Rules and Regulations*, which was last approved by
6 the Board in Board Order P.U. 18 (2024). Legislative requirements related to the
7 measurement of electricity and the verification of electrical meters are also
8 established by the *Weights and Measures Act*, RSC 1985, c. W-6, and the *Electricity*
9 *and Gas Inspection Act*, RSC 1985, c. E-4, and the regulations thereunder.

10
11 The Board's Provisional Guidelines require that capital expenditures associated with
12 meters be categorized as programs.¹ "Mandatory" is an investment classification
13 defined in the Provisional Guidelines. While the requirement to meter most electrical
14 service is mandatory, neither the *Replacement Meters* program nor the *New Meters*
15 program is classified as being within the Mandatory investment classification in
16 Newfoundland Power's *2025 Capital Budget Application*.²

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18 c) See part b). Regulations relating to metering can be found in section 7 of the
19 Company's *Schedule of Rates, Rules and Regulations*.
20
21 d) Newfoundland Power's current metering standard is not mandated by statute or
22 regulation. For more information, see part e).
23
24 e) Newfoundland Power completed a detailed report which included a cost benefit
25 analysis for the transition to AMR metering in its *2013 Capital Budget Application*.
26 See report *4.3 2013 Metering Strategy* included in Newfoundland Power's *2013*
27 *Capital Budget Application*.
28
29 f) There is no statute or policy that precludes the application of evolving technologies
30 and processes relating to metering, provided that any new metering technology is
31 verified pursuant to the *Electricity and Gas Inspection Act*.

¹ See the Provisional Guidelines, page 12 of 18.

² See the 2025 Capital Budget Application, Schedule C, page 1 of 9. The *Replacement Meters* program is classified as being within the Renewal investment classification. The *New Meters* program is classified as being within the Access investment classification.