

WHENEVER. WHEREVER.
We'll be there.



HAND DELIVERED

January 10, 2020

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

Ladies and Gentlemen:

Re: NLH Application for Approval of the Construction and Installation of 14 Level 3 Direct Current Fast Chargers and 14 Level 2 Chargers

Please find enclosed the original and 8 copies of Newfoundland Power's Requests for Information NP-NLH-001 to NP-NLH-010 in relation to the above noted Application.

For convenience, the Requests for Information are provided on three-hole punched paper.

A copy of this letter, together with enclosures, has been forwarded directly to the parties listed below.

If you have any questions regarding the enclosed, please contact the undersigned at your convenience.

Yours very truly,

A handwritten signature in blue ink, appearing to read "Kelly Hopkins".

Kelly Hopkins
Corporate Counsel

Enclosures

c. Shirley Walsh
Newfoundland and Labrador Hydro

Dennis Browne, QC
Browne Fitzgerald Morgan Avis

Paul Coxworthy
Stewart McKelvey

Denis Fleming
Cox & Palmer

Dean Porter
Poole Althouse

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

IN THE MATTER OF

the *Electrical Power Control Act, 1994*,
SNL 1994, Chapter E-5.1 (the “*EPCA*”)
and the *Public Utilities Act, RSNL 1990*,
Chapter P-47 (the “*Act*”), as amended; and

IN THE MATTER OF an Application by
Newfoundland and Labrador Hydro (“*Hydro*”)
for an Order approving the construction and
installation of 14 Level 3 Direct Current Fast
Chargers and 14 Level 2 chargers pursuant to
Section 41 (3) of the *Act*.

**Requests for Information by
Newfoundland Power Inc.**

NP-NLH-001 to NP-NLH-010

January 10, 2020

Requests for Information

- NP-NLH-001 Reference: Hydro’s December 19, 2019 letter to the Board Re: Application for Approval of the Construction and Installation of 14 Level 3 Direct Current Fast Chargers and 14 Level 2 Chargers.
- “Hydro will file a further application in the first quarter of 2020 regarding the consideration Hydro intends to recover from EV owners for the charging services Hydro will provide.”*
- Why has Hydro chosen to file the Application separate from the application anticipated to be filed in the first quarter of 2020?
- NP-NLH-002 Reference: Hydro’s December 19, 2019 letter to the Board Re: Application for Approval of the Construction and Installation of 14 Level 3 Direct Current Fast Chargers and 14 Level 2 Chargers.
- “Hydro will file a further application in the first quarter of 2020 regarding the consideration Hydro intends to recover from EV owners for the charging services Hydro will provide.”*
- Does Hydro consider the charging services it intends to provide to EV owners by means of the proposed EV charging network to be a “service” within the meaning of the *Public Utilities Act* (the “Act”) and, as such, subject to rate regulation under the Act? Is this consistent with the practice in other jurisdictions? Please provide a detailed explanation.
- NP-NLH-003 Does Hydro consider its Application to construct its proposed EV fast charging network to be subject to the provisions of Section 39 of the *Public Utilities Act*? Please provide a detailed explanation.
- NP-NLH-004 Reference: Application for Approval of the Construction and Installation of 14 Level 3 Direct Current Fast Chargers and 14 Level 2 Chargers, Schedule 1, Page 4, Table 2: Project Schedule.
- Has the timeline for the filing of the Application been influenced by any conditions attached to Government funding? If so, please provide details.
- NP-NLH-005 Has Hydro considered whether and how the construction and installation of Hydro’s proposed EV fast charging network will be incorporated into utility conservation, demand management and electrification planning? If not, why not?

NP-NLH-006 Reference: Application for Approval of the Construction and Installation of 14 Level 3 Direct Current Fast Chargers and 14 Level 2 Chargers, Page 2, Paragraph 7.

“The completion of the proposed Project charging network will bring the first DCFC network to the province, promote EV based tourism, and allow for increased domestic ownership of EVs which will reduce greenhouse gas emissions and promote electrification in the province.”

Should efforts regarding electrification in the province be planned, administered and regulated using the TakeCharge partnership between Hydro and Newfoundland Power? If not, why not?

NP-NLH-007 Reference: Application for Approval of the Construction and Installation of 14 Level 3 Direct Current Fast Chargers and 14 Level 2 Chargers, Schedule 1, Page 4, Line 6.

“Once established, Hydro will maintain and operate the charging network.”

Please describe in detail whether Hydro’s maintenance and operation of the charging network will be organized so as to avoid cross-subsidization between it and the maintenance and operation of Hydro’s other regulated operations.

NP-NLH-008 Reference: Application for Approval of the Construction and Installation of 14 Level 3 Direct Current Fast Chargers and 14 Level 2 Chargers, Schedule 1, Page 4, Line 6.

“Once established, Hydro will maintain and operate the charging network.”

Please confirm that no costs associated with the charging network over its life will be recovered from Newfoundland Power or its customers through electricity rates. If this cannot be confirmed, please explain.

NP-NLH-009 Reference: Application for Approval of the Construction and Installation of 14 Level 3 Direct Current Fast Chargers and 14 Level 2 Chargers, Schedule 1, Page 2, Lines 1-3.

“The completion of the proposed charging network will bring the first DCFC network to the province, promote EV based tourism, and allow for increased domestic ownership of EVs which will reduce greenhouse gas emissions and promote electrification in the province.”

Please explain whether and how the installation of an EV fast charging network will contribute to rate mitigation efforts.

NP-NLH-010

Reference: Application for Approval of the Construction and Installation of 14 Level 3 Direct Current Fast Chargers and 14 Level 2 Chargers, Schedule 1, Page 1, Lines 14-15.

“In preparing to undertake this project, Hydro researched best practices in other jurisdictions and worked with government agencies to determine the appropriate scope for this project.”

Please describe in detail how Hydro’s research of best practices in other jurisdictions influenced the scope of the proposed project.

RESPECTFULLY SUBMITTED at St. John’s, Newfoundland and Labrador, this 10th day of January, 2020.



NEWFOUNDLAND POWER INC.
P.O. Box 8910
55 Kenmount Road
St. John’s, Newfoundland A1B 3P6

Telephone: (709) 737-5364
Telecopier: (709) 737-2974