

Office of the Consumer Advocate

May 11, 2026

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

Attention: Mike McNiven, Board Secretary

Dear Mr. McNiven:

Re: NLH - Application for Extension to Filing Date for Methodology for Wholesale Rate Annual Updates

On April 28, 2026 Newfoundland and Labrador Hydro (“Hydro”) submitted to the Public Utilities Board (the “Board”) an Application for Extension to Filing Date for Methodology for Wholesale Rate Annual Updates (the “Application”). The Application requests (Application Clause 14) the Board “*approve an extension of time to file its methodology for updating the wholesale rate to November 2026.*” Hydro goes on to say (Application Clause 15) “*Hydro submits that granting the requested extension is reasonable, will not prejudice any party, and will support the development of a high-quality and comprehensive methodology for updating the wholesale rate and Island Industrial rate annually, consistent with the Board’s regulatory objectives.*”

On April 30, 2026 the Board requested the parties to submit comments on the Application. This document conveys the comments of the Consumer Advocate.

Hydro states (Application, Clause 11) “*This approach aligns with the Board’s determination in Board Order No. P.U. 1(2025), that wholesale rate design issues are best addressed in a manner that balances embedded demand costs, marginal energy costs, and marginal capacity costs, rather than through isolated or piecemeal adjustments.*” It is also important that the wholesale rate methodology be reviewed within the context of rate designs for Island Industrial Customers (Application Clause 10). With this in mind, the Consumer Advocate believes that the appropriate forum for a review of the methodology for updating the wholesale rate is a General Rate Application (“GRA”). Hydro indicates (Application Clause 9) that it is currently preparing its GRA. Based on the anticipated timelines for the GRA, a review of the wholesale rate design methodology would coincide with the review of the GRA.

The Consumer Advocate therefore does not object to the Application.

Please contact the undersigned if you have any questions relating to this submission.



Adrienne Ding

Interim Consumer Advocate

323 Duckworth Street, P.O. Box 5955

St. John's, NL A1C 5X4

Telephone: (709) 853-5530

Email: consumeradvocate@odeaearle.ca; ading@odeaearle.ca

Fax: (709) 726-9600

Justin King

Counsel to the Consumer Advocate

Email: jking@odeaearle.ca