Q. In the Executive Summary, the Applicant stated that the EV Load Management Pilot Project aims to understand EV charging behaviours in the province and the effectiveness, cost, and challenges of different strategies to shift EV load to off-peak periods.

(a) With the low number of EV vehicles currently in the province and the low number of residential customers with EVs, how can any such project be effective at this time?

(b) If the strategy is to shift EV load to off-peak periods, is the Applicant referencing time of day/time of use rates, or alternatively, how is this to be achieved?

(c) When was the last time the Applicant studied time of use rates, and what was the result of that study?

(d) Is the Applicant now advocating time of use rates and, if so, are the meters installed in recent years by Newfoundland Power equipped for time of use rates?

(e) Who prepared the EV Load Management Pilot Project and what costs were incurred in the preparation of this application?

A. (a) There are currently 787 EVs registered in Newfoundland and Labrador.[1] Other provinces have undertaken EV load management research with similar levels of adoption. For example, SaskPower and Nova Scotia Power launched EV pilot projects in 2021 with fewer than 1,000 EVs in each province.[2]

The current level of EV adoption in Newfoundland and Labrador, while low, is sufficient to conduct a pilot project that provides meaningful results. The pilot project is timed such that the results can be used to inform strategies for managing EV load prior to 2026, which is when EV adoption is expected to begin increasing in response to federal targets.[3]

Waiting until EV adoption increases in the province before exploring options to manage the load impacts of EVs would not be beneficial for Newfoundland Power's customers. Rather, it would ultimately delay the implementation of measure to manage this load that would be aimed at managing potential costs increases for customers.

(b) The EV Load Management Pilot Project will not include time-of-use rates. Time-of-use rates provide kWh-based price signals to shift customers' electricity consumption to off-peak periods and typically apply on a whole-home basis rather than for specific end uses. The EV Load Management Pilot Project will use incentives to encourage the shifting of a specific end use, EV charging, to off-peak periods.[4] While this differs from time-of-use rates, the information collected will provide information on the effectiveness of price signals in shifting EV charging to off-peak periods. This information may be helpful in future assessments of time-of-use rates.

---

1 See the Application, *EV Load Management Pilot Project* report, page 4, lines 7-10.

2 See the Application, *EV Load Management Pilot Project* report, Attachment B, and the response to Request for Information CA-NP-010, Table 1.

3 See the response to Request for Information CA-NP-008.

4 The actual amount of the incentives offered to participants will be determined in consultation with the third-party service provider selected to deliver the pilot project.

(c) Newfoundland Power's last study of time-of-use rates was completed in 2019 by Dunsky Energy + Climate Advisors ("Dunsky"). Dunsky determined that dynamic rates, such as time-of-use rates, may become cost-effective for customers between 2030 and 2034.[5]

(d) No, Newfoundland Power is not advocating for time-of-use rates at this time. Time-of-use rates will be considered, amongst other demand management measures, in Newfoundland Power's and Newfoundland and Labrador Hydro's next conservation potential study, which is scheduled to be completed in 2024.

Newfoundland Power currently uses Automated Meter Reading ("AMR") technology. AMR meters do not provide the interval data required to support time-of-use rates.[6]

(e) The EV Load Management Pilot Project was prepared by Newfoundland Power's Energy Solutions team. The Company does not track labour costs associated with application preparation. Therefore, the requested cost figure cannot be provided.

[5] See Newfoundland Power's *2021 Electrification, Conservation and Demand Management Application,* Volume 2, Schedule E.

[6] Newfoundland Power's customers on *Rate 2.4 General Service (1,000 kVA and Over)* are the only customers with meters capable of providing interval data. These meters could be used for time-of-use rates. As of May 2023, there were a total of 59 Rate 2.4 customers.