

1 **Q. Of the utilities surveyed, only one used both active and passive load**
2 **management strategies in their pilot project. Please provide Newfoundland**
3 **Power’s rationale for investigating both active and passive load management**
4 **strategies.**
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6 A. There are three primary factors underpinning Newfoundland Power’s rationale to
7 investigate both active and passive load management strategies.
8

9 First, the Company’s survey of utilities’ EV load management strategies showed there is
10 no prevailing industry practice. Of the nine utilities that have chosen to explore either
11 passive or active load management strategies, four chose to explore passive strategies
12 and five chose to explore active strategies.¹ This indicates both strategies are consistent
13 with sound public utility practice and are reasonable to investigate.
14

15 Second, active and passive load management strategies present different costs and
16 benefits. Passive strategies require customers to opt in to demand response events,
17 which provides less certainty about peak demand savings. Active strategies give the
18 utility direct control of a vehicle’s charging and require customers to opt out of demand
19 response events. The effectiveness of these strategies depends upon customer
20 acceptance within a jurisdiction. Additionally, while active strategies can achieve greater
21 peak demand savings, passive strategies can cost less to implement. Given these
22 differing costs and benefits, Newfoundland Power determined it requires information on
23 each type of strategy to determine what options would be in the best interests of its
24 customers.²
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26 Third, it is Newfoundland Power’s goal to use the results of the pilot project to inform
27 the next suite of customer demand management programs to be launched by the
28 utilities in 2026.³ This coincides with when EV adoption in the province is expected to
29 become more widespread in response to federal zero-emissions vehicle targets.⁴
30 Information on the cost-effectiveness of EV load management strategies is required in
31 advance of this timeframe. As a result, the Company determined it was necessary to
32 assess both types of strategies at once and ruled out the option of proceeding with
33 separate pilots over time to assess the different strategies.

¹ See the Application, *EV Load Management Pilot Project* report, Attachment B.

² See the Application, *EV Load Management Pilot Project* report, page 10, lines 14 to 18.

³ See the Application, *EV Load Management Pilot Project* report, page 1, lines 23 to 24.

⁴ The Federal Government has established a national target for zero-emissions vehicles to account for 20% of annual vehicle sales by 2026. See the Application, *EV Load Management Pilot Project* report, page 4, lines 13 to 15.