Q. (Reference Application) What is the overall improvement in productivity stemming from the projects included in the 2024 Capital Budget Application? Please identify the expected cost savings and provide an estimate of the impact on rates.

A. **A.** Productivity Improvements

Newfoundland Power's *2024 Capital Budget Application* includes: (i) projects that will maintain the productivity of its operations; and (ii) projects that will improve the productivity of its operations.¹ These include:

- (i) The *LED Street Lighting Replacement* project. The replacement of High Pressure Sodium ("HPS") street lights with more reliable Light Emitting Diode ("LED") street lights commenced in 2021 and is proposed to continue in 2024. The replacement of HPS street lights with LED street lights reduces energy and maintenance costs for street lighting customers and results in lower customer rates.²
- (ii) The 2024 *Application Enhancements* project. This project includes items that will improve the productivity of Newfoundland Power's operations through the reduction or elimination of manual processes to reduce costs to customers.³
- (iii) The *Distribution Feeder Automation* project. This project will increase automation in the Company's distribution system through the addition of automated downline reclosers and fault indicators. The deployment of automated distribution equipment will enhance the Company's response to customer outages in all operating conditions, including local and system-wide outages. For example, the operation of 12 downline reclosers during Hurricane Larry in September 2021 avoided approximately 3.8 million customer outage minutes without the assistance of field crews. This allowed field crews to maintain their productivity in restoring service to customers. Additionally, the operation of six downline reclosers during Hurricane Fiona in September 2022 avoided approximately 1.7 million customer outage minutes. S
- (iv) Over 50% of proposed 2024 capital expenditures are driven by the refurbishment or replacement of existing assets.⁶ These expenditures are required to maintain the condition of the electrical system and to provide reliable service to customers. Failure to maintain the Company's electrical system would result in increased equipment failures and customer outages. This would

See the response to Request for Information PUB-NP-004 for additional information on savings and reduced operating costs.

² See Newfoundland Power's *2024 Capital Budget Application, Schedule B,* pages 2 to 5, and the response to Request for Information PUB-NP-009.

³ See Newfoundland Power's 2024 Capital Budget Application, report 5.1 2024 Application Enhancements.

⁴ See Newfoundland Power's 2024 Capital Budget Application, Schedule B, pages 15 to 19.

⁵ Ibid, page 18.

⁶ See Newfoundland Power's 2024 Capital Budget Application, 2024 Capital Budget Overview, page 1.

increase operational expenditures required to restore service to customers and would be detrimental to the productivity of Newfoundland Power's operations.

B. Pro Forma Customer Rate Impacts

Due to the complex nature of how capital expenditures impact customer rates, Newfoundland Power does not assess the customer rate impact of individual capital projects or programs. The Provisional Guidelines require a proposed budget impact summary that assesses the revenue requirement impact and indicative electricity rates assuming that the proposed capital budget is approved in full.⁷

On a *pro forma* basis, the capital expenditures proposed in Newfoundland Power's *2024 Capital Budget Application* are estimated to increase the Company's annual revenue requirement by approximately \$4 million.⁸ For a breakdown of this amount, see the response to Request for Information PUB-NP-004.

This estimate includes approximately \$1.7 million in reduced operating costs and avoided electricity costs associated with the *LED Street Lighting Replacement* and *Application Enhancements* projects. This \$1.7 million operating cost savings estimate translates to a customer rate benefit of approximately 0.2%.⁹

The proposed refurbishment of the Company's Mobile and Lookout Brook hydro plants included in Newfoundland Power's *2024 Capital Budget Application* will result in the continued provision of low-cost energy to customers, thereby avoiding the need to purchase more expensive replacement production. The customer benefit associated with the continued operation of the Mobile and Lookout Brook hydro plants is estimated to be approximately \$4.1 million in lower annual revenue requirement. This \$4.1 million estimate translates to a customer rate benefit of approximately 0.5%.¹⁰

For further discussion on the relationship between the Company's capital investments, revenue requirements and customer rates, see Newfoundland Power's 2024 Capital Budget Application, 2024 Capital Budget Overview, Section 2.3.3 Customer Rates.

⁷ See *section I.C. Rate Impact Summary* of Appendix A the Provisional Guidelines.

⁸ See Newfoundland Power's 2024 Capital Budget Application, 2024 Capital Budget Overview, Section 2.3.3 Customer Rates.

⁹ Customer rate benefit estimated as follows: \$1.7 million ÷ current customer billings of approximately \$785 million as outlined in Newfoundland Power's *Application for July 1, 2023 Customer Rates* filed with the Board on June 2, 2023.

 $^{^{10}}$ Customer rate benefit estimated as follows: \$4.1 million \div current customer billings of approximately \$785 million.