

- 1 **Q. (Reference Application Schedule B, Feeder Additions for Load Growth, pages 7**
 2 **and 9)**
 3 **a) Are rooftop solar or wind viable alternatives for off-loading feeders?**
 4 **b) In Table 1, the total budget is stated at \$2,811,000. Of this amount**
 5 **\$516,000 is referenced as "Other" in the Cost Categories. Please provide**
 6 **the specifics of these "Other Costs".**
 7
- 8 A. a) No, Newfoundland Power does not consider rooftop solar or wind to be viable
 9 alternatives for off-loading feeders at this point in time.¹ The Company continues to
 10 monitor penetration of customer-owned generation and battery storage through its
 11 Net Metering program, as well as the impact of customer-owned generation on
 12 feeder loading in general. At this time, penetration of customer-owned generation
 13 and battery storage remains low.
 14
- 15 b) The \$516,000 of "Other" costs are associated with the BVS-04 project and were
 16 calculated incorrectly.² Portable generation that is required to minimize customer
 17 outages during the upgrade of BVS-04 amounting to \$110,000 belongs in the
 18 "Other" Cost Category. The remaining \$406,000 for internal and contract labour and
 19 material contingency should have been allocated to those cost categories. For
 20 consistency purposes, Table 1 shows a revised breakdown of *Feeder Additions for*
 21 *Load Growth* project costs.

Table 1 Feeder Additions for Load Growth Project 2024 Project Cost (\$000s)				
Cost Category	BVS-04	OMP-01	PUL-02	Total
Material	309	148	160	617
Labour – Internal	560	144	189	893
Labour - Contract	453	157	228	838
Engineering	304	21	28	353
Other	110	0	0	110
Total	1,736	470	605	2,811

¹ Rooftop solar and wind alternatives are not currently viable from both a technical and financial standpoint. Newfoundland Power's system peak typically occurs during the winter and often in the evening times. In addition, wind generation is often intermittent. In order to achieve offloading during peak times, these alternatives would also require battery storage solutions. From a financial perspective, battery storage alternatives were evaluated for each of the proposed *Feeder Additions for Load Growth* projects and were determined to not be least cost.

² See Newfoundland Power's *2024 Capital Budget Application, 1.2 Feeder Additions for Load Growth*, page 14, Table 1.