

1 **Q. (Reference CA-NP-027) Please confirm that NP does not employ an integrated**
 2 **approach to distribution planning that takes into consideration environmental**
 3 **emissions and government zero-carbon efforts.**
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5 A. Integrated distribution system planning includes the planning for grid modernization and
 6 using distributed energy resources (“DERs”) for grid services including non-wires
 7 alternatives (“NWAs”). Newfoundland Power can confirm that its current practices do
 8 not fully incorporate integrated distribution system planning. However, the use of NWAs
 9 and DERs are assessed as part of the assessment of alternatives for capital projects,
 10 when relevant.
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12 In jurisdictions where integrated distribution system planning is taking place, it is being
 13 undertaken to meet customers’ changing expectations and use of DERs and NWAs.¹ For
 14 high levels of DER and NWA adoption, integrated distribution system planning may be
 15 done on a system-wide basis. For low levels of adoption, DER and NWA technology can
 16 be accommodated within the existing distribution system planning and operations.²
 17 With less than 30 net metering customers, Newfoundland Power falls into the low level
 18 adoption scenario.³
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20 See the responses to Requests for Information CA-NP-046 and CA-NP-169 for
 21 information regarding the Company’s approach to assessing NWAs for capital projects.
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23 See the response to Request for Information CA-NP-176 for additional information
 24 regarding the potential of customer-owned battery storage interconnection with
 25 Newfoundland Power’s distribution system.
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27 See the response to Request for Information CA-NP-014 for information regarding the
 28 Company’s approach to delivering electrical service in an environmentally responsible
 29 manner.

¹ “Integrated distribution system planning in the 21st Century needs to assess physical and operational changes to the electric grid necessary to enable safe, reliable and affordable service that satisfies customers’ changing expectations and use of DERs.” See ICF International (2016), *Integrated Distribution Planning*, page iv, available at <https://www.energy.gov/oe/articles/integrated-distribution-planning-report-august-2016#:~:text=interoperable%20utility%20network.%E2%80%9D-INTEGRATED%20DISTRIBUTION%20PLANNING,expectations%20and%20use%20of%20DERs>

² Ibid, page 2, figure 3 and page 3.

³ As of December 31, 2022, Newfoundland Power had 28 Net Metering Service Option customers, totaling 303.3 kW of generation capacity and 90,508 kWh of energy delivered to Newfoundland Power. This represents approximately 0.02% of Newfoundland Power’s peak demand for the 2022-2023 winter season and approximately 0.002% of the Company’s annual energy sales.