

1 **Q. (Reference CA-NP-071) It is stated "Ontario, British Columbia, Quebec and the**  
2 **Yukon have active NWA initiatives, however the majority of projects are in the**  
3 **pilot phase." Should NL likewise be conducting a pilot on NWA initiatives to**  
4 **inform NP on future distribution planning activities, or does NP believe that**  
5 **NWA is lagging in NL so there is no need to conduct a pilot at this time?**  
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7 A. The costs and benefits of non-wires alternatives ("NWAs") vary from jurisdiction to  
8 jurisdiction. Newfoundland Power considers NWA projects and pilots as part of its  
9 capital and electrification, conservation and demand management planning processes.

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11 Commercial-grade battery storage was considered as an alternative to mitigate the three  
12 overload conditions outlined in the 2024 *Feeder Additions for Load Growth* project. For  
13 each overload condition assessed, battery storage was determined not to be a least-cost  
14 solution.<sup>1</sup> In the case of the pre-existing overload conditions identified in the 2024  
15 *Feeder Additions for Load Growth* project, Newfoundland Power affirms that upgrading  
16 the overloaded single-phase sections to three-phase is the solution that is least-cost and  
17 poses minimal risks to customers in terms of potential outages.<sup>2</sup>  
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19 Demand management can also be classified as an NWA. Newfoundland Power is  
20 scheduled to complete an *Electric Vehicle Load Management Pilot Project* from 2023 to  
21 2025. The information gathered through the pilot project on electric vehicle charging  
22 and the potential for demand management can help inform future NWA projects and  
23 pilots. For example, in the future, an electric vehicle demand management program  
24 may be a viable option in deferring or avoiding distribution upgrades.<sup>3</sup>  
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26 Newfoundland Power will continue to evaluate the potential for NWA initiatives, and  
27 assess if a pilot would have customer benefits.

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<sup>1</sup> Capital costs associated with commercial-grade battery storage exceeded the recommended alternatives proposed in the 2024 *Feeder Additions for Load Growth* project by \$317,000 to \$930,000.

<sup>2</sup> Newfoundland Power may consider pursuing a commercial-grade battery storage pilot in cases where their implementation carries minimal risks to customers if the technology becomes more economical.

<sup>3</sup> To address the potential overloads that may result from electric vehicle charging on specific distribution feeders.