

- 1 **Q. (Reference CA-NP-122)**
2 **a) Does Newfoundland Power assist Net Metering customers with any necessary**
3 **government authorizations and permits (Attachment A)?**
4 **b) Please file for the record copies of all complaints filed by Net Metering**
5 **customers against Newfoundland Power.**
6 **c) Has Newfoundland Power ever entered a Net Metering customer's premises**
7 **without notice? If so, were there repercussions?**
8 **d) Does Newfoundland Power equate the one-page Electrical Service Contract in**
9 **Attachments B and C to an 8-page interconnection agreement such as that**
10 **required of Net Metering customers in Attachment A?**
11 **e) Is the one-page interconnection agreement between Newfoundland Power and its**
12 **Rate 2.4 customers that are directly connected to the transmission system at**
13 **66kV the same as the interconnection agreement required of a Domestic Class**
14 **1.1 customer supplied at 220V?**
15 **f) Is a sub-standard 220V connection to the distribution system likely to have a**
16 **similar impact on reliability as a substandard 66kV connection to the**
17 **transmission system?**
18
19 **A. a) The *Electrical Regulations* under the *Public Safety Act* require a permit to be obtained**
20 **prior to commencing electrical work.¹ Following the installation of electrical**
21 **equipment, the work must be inspected and certified by a qualified representative to**
22 **ensure the installation meets the requirement of the *Canadian Electrical Code*.²**
23
24 **Obtaining the necessary permits through Service NL for the installation of net**
25 **metering equipment is the responsibility of the customer and their qualified**
26 **electrician. Newfoundland Power informs prospective Net Metering Service Option**
27 **customers of this requirement and directs them to the Service NL's *Electrical***
28 ***Permits & Inspection* website for the appropriate information.³**
29
30 **b) There have been no formal complaints filed by Net Metering customers against**
31 **Newfoundland Power.**
32
33 **c) Newfoundland Power is not aware of a circumstance whereby an employee has**
34 **entered onto a Net Metering Service Option customer's premises without notice. The**
35 **Net Metering Interconnection agreement provides Newfoundland Power with the**
36 **ability to disconnect a Net Metering Service Option customer's facility for various**
37 **reasons, including in response to emergencies and safety hazards. Whenever feasible,**
38 **the Company will give the customer reasonable advance notice before entering onto**
39 **the customer's premises.⁴**

¹ See section 8 of the *Electrical Regulations*.

² *Ibid.*, section 10.

³ See Government of Newfoundland and Labrador. Electrical Permits. Retrieved from <https://www.gov.nl.ca/dgsnl/licences/electrical/permits/>

⁴ See the response to Request for Information CA-NP-122, Attachment A, *Sample Net Metering Interconnection Agreement*, pages 4-5.

- 1 d) All of Newfoundland Power’s customers receive service in accordance with
2 Newfoundland Power’s *Schedule of Rates, Rules and Regulations*. Unlike typical
3 Newfoundland Power customers who only receive electricity from the Company,
4 customers availing of the Net Metering Service Option have their own sources of
5 generation that operate in parallel with Newfoundland Power’s electricity system.
6 The interconnection agreement is necessary to ensure electricity supplied from the
7 Net Metering Service Option customer is done so in a safe manner.
8
- 9 e) See the response to Request for Information CA-NP-265, part b).
- 10
- 11 f) The *Electrical Regulations* require that all electrical installations meet the
12 requirements of the Canadian Electrical Code, and any sub-standard installation
13 would be in violation of the *Public Safety Act*. With respect to reliability, increasing
14 voltage typically means increasing customer load requirements. As a result, a
15 customer with a 220V service that experiences an outage will lose less load than a
16 customer with a 66 kV service.