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1 (9:00 a.m.)
 2 CHAIR:
 3 Q. Good morning everyone. Any preliminary
 4 matters, Ms. Glynn
 5 MS. GLYNN:
 6 Q. None that I am aware of, other than we do
 7 have a couple of new faces. Mr. Browne, if
 8 you would like to introduce –
 9 BROWNE, KC:
 10 Q. Mr. Bowman is here, Doug Bowman, he’s
 11 presenting evidence tomorrow or within the
 12 next day, all depends. He’s been here many
 13 times and I think he first appeared here in
 14 1998, so he knows the system.
 15 CHAIR:
 16 Q. I think you have the same tenure with regard
 17 to these hearings, Mr. Browne. Good
 18 morning, Mr. Bowman. And is there another
 19 visitor? No, it’s just Mr. Bowman.
 20 MS. DING:
 21 Q. Yes, good morning, Commissioners. I brought
 22 with me today our summer student, Andrew
 23 Seviour.
 24 CHAIR:
 25 Q. Good morning, welcome.

Page 2

1 MR. SEVIOUR:
 2 Q. Good morning.
 3 CHAIR:
 4 Q. And we’ll get going, so it’s back to Mr.
 5 O’Brien.
 6 MR. O’BRIEN:
 7 Q. Thank you, Mr. Chair. We have Byron Chubbs.
 8 Mr. Chubbs would prefer to be sworn, so we’d
 9 need the Bible, I guess.
 10 CHAIR:
 11 Q. Good morning, Mr. Chubbs.
 12 MR. CHUBBS:
 13 A. Good morning.
 14 MR. BYRON CHUBBS (SWORN)
 15 CHAIR:
 16 Q. Back to you, Mr. O’Brien.
 17 MR. BYRON CHUBBS, EXAMINATION-IN-CHIEF BY MR. LIAM
 18 O’BRIEN
 19 MR. O’BRIEN:
 20 Q. Thank you, Mr. Chair. Mr. Chubbs, would you
 21 please introduce yourself?
 22 MR. CHUBBS:
 23 A. Good morning, I’m Bryon Chubbs, vice-
 24 president of engineering and energy supply
 25 at Newfoundland Power and I’ve held that

Page 3

1 position since 2018.
 2 MR. O’BRIEN:
 3 Q. And what positions did you hold before that?
 4 MR. CHUBBS:
 5 A. From 2016 to 2018 I was vice-president of
 6 customer service with Maritime Electric in
 7 PEI, and prior to that, I was director of
 8 eastern region at Newfoundland Power.
 9 MR. O’BRIEN:
 10 Q. And do you adopt Section 2 of Customer
 11 Operations as your testimony?
 12 MR. CHUBBS:
 13 A. Yes, I do.
 14 MR. O’BRIEN:
 15 Q. Are there any changes you would like to make
 16 to the pre-filed evidence and exhibits at
 17 this time?
 18 MR. CHUBBS:
 19 A. No, there are not.
 20 MR. O’BRIEN:
 21 Q. Mr. Chubbs, what aspects of Newfoundland
 22 Power’s operations would you address for the
 23 Board?
 24 MR. CHUBBS:
 25 A. I’d like to touch on our operating costs and

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1 efficiency, our capital program, the
 2 reliability of our electricity system and
 3 our customer program delivery.
 4 MR. O’BRIEN:
 5 Q. Okay, let’s start with the operating costs
 6 and efficiency, can you speak to
 7 Newfoundland Power’s performance in managing
 8 its operating costs?
 9 MR. CHUBBS:
 10 A. Newfoundland Power has continually
 11 demonstrated sound management of our
 12 operating costs. Over the last decade, our
 13 operating costs per customer was reduced by
 14 approximately 9.5 percent on an inflation
 15 adjusted basis. This demonstrates our
 16 continued focus on operating efficiency. If
 17 we look at it over a longer period and
 18 consider the recent cost pressures that are
 19 being experienced industrywide, our
 20 operating cost per customer from 2013 to
 21 2026 are forecast to reduce by 7.9 percent
 22 on an inflation adjusted basis.
 23 MR. O’BRIEN:
 24 Q. Do you have examples of ways Newfoundland
 25 Power has been able to improve its operating

Page 5

1 efficiency to date?
 2 MR. CHUBBS:
 3 A. Yes, one example is that we've reduced meter
 4 reading costs through automated technology.
 5 We've also reduced costs related to customer
 6 inquiries through online self service
 7 options and a high volume call answering
 8 system. Increased automation of our
 9 distribution system has also led to
 10 operating efficiencies by allowing us to
 11 respond to trouble on the system without
 12 having to dispatch field crews. We've also
 13 leveraged our geographing information
 14 systems and our outage management systems to
 15 achieve efficiencies in multiple ways, from
 16 eliminating duplicate reporting to allowing
 17 us to deploy field crews in a more targeted
 18 fashion. These are all initiatives that
 19 ultimately reduce labour costs for our
 20 customers through the use of technology.
 21 MR. O'BRIEN:
 22 Q. Beyond cost savings, how do technologies
 23 benefit customers?
 24 MR. CHUBBS:
 25 A. LED street lighting is a good example of a

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1 technology that provides multiple benefits
 2 to customers. LED street lights last longer
 3 than traditional street lights, meaning that
 4 customers experience fewer street light
 5 outages. They provide a better quality
 6 lighting that our customers prefer and they
 7 provide lower customer rates as soon as
 8 they're installed. We've implemented a plan
 9 to provide all of our street and area
 10 lighting customers with LED fixtures by
 11 2026.
 12 From an operation's perspective, our
 13 customers benefit from our new technologies
 14 during major storms. For example, during
 15 Snowmageddon in 2020, the Avalon area saw 90
 16 centimeters of snow and wind gusts of over
 17 170 kilometers an hour. During that storm,
 18 our high volume call answering system
 19 automatically answered 18,000 customer
 20 calls. Our outage management system
 21 automatically assist and grouped 5000 outage
 22 reports to predict the location of outages,
 23 and the operation of automatic downline
 24 reclosures during that storm automatically
 25 saved 3.5 million customer minutes of

Page 7

1 outage. This automation allows our crews to
 2 focus on restoring service to our customers,
 3 instead of spending time searching for
 4 faults on the system.
 5 MR. O'BRIEN:
 6 Q. Now we've heard some evidence from Mr.
 7 Murray and Ms. London about the effects of
 8 inflation, can you describe the impact of
 9 inflation that that's had on Newfoundland
 10 Power's operating costs?
 11 MR. CHUBBS:
 12 A. Yes, I can. We filed our last General Rate
 13 Application in 2021. At that time inflation
 14 was forecast to be 5.8 percent from 2020
 15 through to our 2023 test year. Actual
 16 increases were significantly higher at
 17 approximately 17 percent. Those
 18 unanticipated increases in inflation are
 19 reflected in our actual operating costs for
 20 that period.
 21 MR. O'BRIEN:
 22 Q. Did inflation affect both labour and non-
 23 labour costs?
 24 MR. CHUBBS:
 25 A. The impact of inflation was predominantly

Page 8

1 seen in our actual 2023 non-labour operating
 2 costs, such as computing equipment and
 3 software costs and insurance. The company
 4 has limited ability to control these costs
 5 as they're subject to external market
 6 conditions. These non-labour costs were
 7 approximately 12 percent higher than
 8 forecast in 2023. That increase is nearly
 9 the same as the actual increase in inflation
 10 over that period. On the other hand, our
 11 actual labour costs were closely in line
 12 with our 2021 General Rate Application
 13 forecast.
 14 MR. O'BRIEN:
 15 Q. So turning to the 2025, 2026 test years,
 16 what's the anticipated impact of
 17 Newfoundland Power's operating costs on the
 18 rate increases sought in this application?
 19 MR. CHUBBS:
 20 A. Approximately 1.6 percent of the rate
 21 increase proposed for July 1st, 2025 relates
 22 to changes in operating costs. That
 23 includes non-labour and labour costs.
 24 MR. O'BRIEN:
 25 Q. Let's discuss the non-labour costs, what are

Page 9

1 the primary drivers of the change in non-

2 labour operating costs for the test years?

3 MR. CHUBBS:

4 A. The three main drivers of changes in non-

5 labour operating costs, computing equipment

6 and software, insurance costs and other

7 company fees. These drivers account for 75

8 percent of the increase in our non-labour

9 operating cost.

10 MR. O'BRIEN:

11 Q. Can you explain why these particular costs

12 have increased?

13 MR. CHUBBS:

14 A. Yes, computing equipment and software costs

15 include annual licensing and support fees

16 for hardware and software solutions.

17 Increases in these costs are consistent with

18 general market trends. Cyber security

19 threats have evolved significantly. As a

20 result, maintaining robust cyber security

21 capabilities, up—to-date software versions

22 and security patches is critical. This not

23 only supports our operations, it protects

24 the electricity system and our customers'

25 personal information from cyber threats.

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1 Insurance costs are increasing at a

2 rate greater than inflation. This is

3 another market trend that is not unique to

4 Newfoundland Power. We retain insurance

5 industry experts who have confirmed that the

6 rates we pay for insurance are the best

7 available.

8 And finally, increases in the other

9 company fees category are associated with

10 such things as regulatory costs and third

11 party consulting fees.

12 MR. O'BRIEN:

13 Q. Now you mentioned labour cost earlier, what

14 impact have these costs had on your

15 application?

16 MR. CHUBBS:

17 A. Well coming out of the pandemic many

18 industries sought wage increases, including

19 the utility sector. In fact, most of the

20 utilities in Atlantic Canada have been

21 impacted with comparable collectively

22 bargained wage increases over the period

23 from 2023 to 2026. These increases have a

24 measurable impact on costs. Our internal

25 labour inflation rate will increase by 4.1

Page 11

1 percent annually from 2022 through 2026;

2 however, Newfoundland Power is forecasting

3 actual labour cost increases at a rate of

4 3.1 percent annually for the same period.

5 This one percent difference demonstrates the

6 company's continued focus on managing its

7 labour costs in an efficient manner.

8 MR. O'BRIEN:

9 Q. Now, Mr. Chubbs, you talked about operating

10 expenses, what is Newfoundland Power doing

11 to manage your capital investments?

12 MR. CHUBBS:

13 A. We manage our capital investments to ensure

14 we're providing reliable service to

15 customers in an environmentally responsible

16 manner, at the lowest possible cost. We

17 balance the cost and reliability of the

18 electricity system through a comprehensive

19 capital planning process and a focus on the

20 overall cost to our customers. It's

21 important to understand that a large portion

22 of our electricity system was built in the

23 '60s and '70s. These assets are now

24 reaching the end of their service lives of

25 50 to 60 years. As a result, our capital

Page 12

1 plan has a focus on replacing an increasing

2 number of these assets over the next five

3 years. Over half of our annual capital

4 expenditures are focused on replacing

5 deteriorated and failed equipment.

6 MR. O'BRIEN:

7 Q. How does Newfoundland Power ensure that its

8 capital investments are least cost for

9 customers?

10 MR. CHUBBS:

11 A. Our capital planning process uses a variety

12 of measures to ensure that our capital

13 investments are reasonable and least cost

14 for customers. These include assessing all

15 viable alternatives for proposed capital

16 projects, deferring capital projects where

17 possible and coordinating related capital

18 projects in a way that ensures they are

19 efficiently conducted. All of our capital

20 investments are comprehensively reviewed by

21 the Board to ensure that they are least cost

22 for customers.

23 MR. O'BRIEN:

24 Q. Now you noted the balanced cost and

25 reliability or that you do so, can you

Page 13

1 describe the reliability of service provided
 2 to Newfoundland Power’s customers?
 3 MR. CHUBBS:
 4 A. Over the last decade our customers have
 5 experienced between 2.2 and 3 hours of
 6 outage per year under normal operating
 7 conditions. That’s about 40 percent better
 8 than the Canadian average over that period
 9 and the frequency of customer outages has
 10 been consistent with the Canadian average
 11 over the same period. We’re focused on
 12 preserving current levels of overall service
 13 reliability for our customers at the lowest
 14 possible cost.
 15 MR. O’BRIEN:
 16 Q. What is Newfoundland Power doing to maintain
 17 current levels of service reliability?
 18 MR. CHUBBS:
 19 A. To maintain current levels of reliability,
 20 Newfoundland Power must focus on the
 21 condition of the electricity system. Our
 22 electricity system is constructed to meet
 23 national standards. This ensures that our
 24 system can withstand the severe weather that
 25 is typical throughout our service territory.

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1 We inspect and maintain our electricity
 2 system annually to proactively identify
 3 deteriorated equipment.
 4 I mentioned how over half our annual
 5 capital expenditures are focused on
 6 replacing deteriorated and failed equipment,
 7 but we will never completely eliminate
 8 equipment failures or weather related
 9 outages. It’s therefore important that we
 10 respond effectively and quickly when there’s
 11 trouble on our system. On that note, our
 12 restoration time for unscheduled outages is
 13 nearly twice as good as the Canadian
 14 average.
 15 MR. O’BRIEN:
 16 Q. So why is it so important for Newfoundland
 17 Power to preserve current levels of system
 18 reliability?
 19 MR. CHUBBS:
 20 A. We’re seeing a number of risks to the
 21 electricity system that underscore the
 22 importance of maintaining current levels of
 23 reliability for our customers. These risks
 24 include a wave of aging assets that are
 25 nearing the end of their life, more frequent

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1 and extreme weather events and the
 2 reliability of power supply to the island
 3 due to uncertainty with the Labrador Island
 4 Link. With all these risks materializing at
 5 the same time, we’re also seeing more
 6 customers converting from oil to electric
 7 heat, and driving electric vehicles and
 8 working from home. Our customers are
 9 relying more than ever on the reliability of
 10 our electricity system.
 11 (9:15 a.m)
 12 MR. O’BRIEN:
 13 Q. And now, Mr. Chubbs, you’ve talked about
 14 your operating costs, your capital program
 15 and system reliability, let’s move on to
 16 your customers programs, how do these
 17 initiatives reduce cost to your customers?
 18 MR. CHUBBS:
 19 A. We offer a variety of conservation and
 20 demand management programs that are aimed at
 21 lowering barriers to customer’s adoption of
 22 energy efficient technologies. Technologies
 23 such as insulation and programmable
 24 thermostats. These programs include our
 25 business efficiency energy savers kit and

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1 insulation rebate programs. These reduced
 2 costs to customers from two perspectives.
 3 First, participating customers see savings
 4 on their monthly electricity bill and in
 5 fact, our customers have experienced bill
 6 savings of approximately 180 million dollars
 7 from 2009 to 2022 through participation in
 8 CDM programs. Second, CDM programs help
 9 manage system costs through avoided energy
 10 costs and by reducing system peak. We’ve
 11 reduced system costs by another 180 million
 12 dollars from 2009 to 2022 through our CDM
 13 programs and this benefit is provided to all
 14 Newfoundland Power’s customers.
 15 MR. O’BRIEN:
 16 Q. Is there anything else you’d like to add on
 17 Newfoundland Power’s delivery of service to
 18 customers?
 19 MR. CHUBBS:
 20 A. Our customer service expectations are always
 21 top of mind. We survey 1800 of our
 22 customers every quarter and have had
 23 consistent customer satisfaction levels over
 24 the last decade through these surveys. This
 25 indicates that we’re meeting our customers’

Page 17

1 expectations.

2 MR. O'BRIEN:

3 Q. Does that conclude your testimony?

4 MR. CHUBBS:

5 A. Yes, it does.

6 MR. O'BRIEN:

7 Q. Thank you, Mr. Chubbs. Open for cross.

8 CHAIR:

9 Q. Over to Mr. Browne.

10 MR. BYRON CHUBBS, CROSS-EXAMINATION BY MR. STEPHEN

11 FITZGERALD

12 FITZGERALD, KC:

13 Q. Thank you, Mr. Chairman, I'll be undertaking

14 the cross. Good morning, Mr. Chubbs, Steve

15 Fitzgerald, despite the lack of a name tag,

16 but I think you know who I am. That's okay,

17 don't mean to give you a hard time there.

18 Oh, here it comes. Now we know who I am.

19 Good to know. Just a couple of questions to

20 start, Mr. Chubbs, can you provide us some

21 information regarding your educational

22 background?

23 MR. CHUBBS:

24 A. Yes, I can. I graduated from Memorial

25 University, I have a degree in electrical

Page 18

1 engineering in 2006.

2 FITZGERALD, KC:

3 Q. And you started work after 2006?

4 MR. CHUBBS:

5 A. Yeah, actually I started work at

6 Newfoundland Power as a work-term student in

7 2004 and I was hired permanently in 2006 as

8 a distribution engineer in the Corner Brook

9 office.

10 FITZGERALD, KC:

11 Q. Okay, so currently you're the VP of energy

12 supply and planning, correct, as you've just

13 identified.

14 MR. CHUBBS:

15 A. VP of engineering and energy supply.

16 FITZGERALD, KC:

17 Q. Energy supply, sorry. And you're part of

18 the executive compensation plan.

19 MR. CHUBBS:

20 A. Yes, that's correct.

21 FITZGERALD, KC:

22 Q. And can you tell us what the maximum payment

23 is for your benefits?

24 MR. CHUBBS:

25 A. Or benefits, are you talking –

Page 19

1 FITZGERALD, KC:

2 Q. Sorry, you've been given—we were discussing

3 yesterday or the Consumer Advocate was

4 asking questions yesterday about the

5 incentive targets that the executive team

6 has, so that was my question, really. So

7 what's your maximum payment under those

8 STIs?

9 MR. CHUBBS:

10 A. So in terms of STIs, so my STI would be,

11 would amount to 35 percent of my annual

12 compensation and then there's a range to

13 that that you can receive between zero

14 percent and up to 200 percent depending on

15 performance and how you meet your targets

16 throughout the year.

17 FITZGERALD, KC:

18 Q. And you've been a VP since 2016, I think, is

19 that—or 2018?

20 MR. CHUBBS:

21 A. I've been a VP at Newfoundland Power since

22 2018 and I was also a VP at Maritime

23 Electric in 2016.

24 FITZGERALD, KC:

25 Q. Right, did they have a similar STI program

Page 20

1 there?

2 MR. CHUBBS:

3 A. Yes, it was similar yes.

4 FITZGERALD, KC:

5 Q. And did you achieve your targets while you

6 were with Maritime Electric?

7 MR. CHUBBS:

8 A. No, their STI program has multiple targets

9 that we measure, from customer service to

10 reliability to managing operating costs.

11 Some years you do better in some areas than

12 others, you know, some years, for example,

13 you know, a poor year on reliability and you

14 don't meet that target, other years

15 operating costs, in which the operating cost

16 pressures like we've seen at Newfoundland

17 Power over the last few years, so I haven't

18 met all targets all years, no.

19 FITZGERALD, KC:

20 Q. Okay, but you've always received or have

21 you, some portion or some amount for STI,

22 just not the full amount, is that—has there

23 ever been a year that you didn't receive any

24 portion of a STI with Newfoundland Power?

25 MR. CHUBBS:

Page 21	<p>1 A. No, there has not.</p> <p>2 FITZGERALD, KC:</p> <p>3 Q. What about with Maritime Electric?</p> <p>4 MR. CHUBBS:</p> <p>5 A. No, there has not.</p> <p>6 FITZGERALD, KC:</p> <p>7 Q. So how many fulltime employees at</p> <p>8 Newfoundland Power would report to you?</p> <p>9 MR. CHUBBS:</p> <p>10 A. Probably around 200, I would think.</p> <p>11 FITZGERALD, KC:</p> <p>12 Q. That's a lot.</p> <p>13 MR. CHUBBS:</p> <p>14 A. Not directly to me, now.</p> <p>15 FITZGERALD, KC:</p> <p>16 Q. Sure, and according to the org. chart, we</p> <p>17 don't have to go there, but Mr. Comerford</p> <p>18 who is going to be testifying as well, he's</p> <p>19 the director of rates and supply and he</p> <p>20 reports to your directly, is that correct?</p> <p>21 MR. CHUBBS:</p> <p>22 A. Yes, that's correct.</p> <p>23 FITZGERALD, KC:</p> <p>24 Q. And can you confirm that you are responsible</p> <p>25 for the asset management, distribution and</p>	Page 23	<p>1 A. So my direct responsibility would be largely</p> <p>2 related to Section 2, our operating cost,</p> <p>3 capital program, capital cost, reliability</p> <p>4 and electricity system, and our customer</p> <p>5 service delivery.</p> <p>6 FITZGERALD, KC:</p> <p>7 Q. Okay. Mr. O'Brien took you through those</p> <p>8 topics this morning. Did you receive any</p> <p>9 direction from the president and CEO and the</p> <p>10 CFO regarding the preparation for this GRA?</p> <p>11 MR. CHUBBS:</p> <p>12 A. I mean, preparation for the General Rate</p> <p>13 Application is a constant conversation that</p> <p>14 Newfoundland Power as certainly as we're</p> <p>15 leading up to our application, so we would</p> <p>16 have worked together on the General Rate</p> <p>17 Application certainly.</p> <p>18 FITZGERALD, KC:</p> <p>19 Q. Sure, were there any particular areas that</p> <p>20 were trouble spots, if you were or if you</p> <p>21 would that required extra attention or extra</p> <p>22 direction or areas that the company thought</p> <p>23 should be emphasized in this GRA?</p> <p>24 MR. CHUBBS:</p> <p>25 A. I think in my direct I probably covered the</p>
Page 22	<p>1 planning in rates with Newfoundland Power?</p> <p>2 MR. CHUBBS:</p> <p>3 A. Say it again, so responsible for asset</p> <p>4 management, distribution planning –</p> <p>5 FITZGERALD, KC:</p> <p>6 Q. Distribution planning and rates.</p> <p>7 MR. CHUBBS:</p> <p>8 A. And rates. Yes, Mr. Comerford reports to</p> <p>9 me, he's responsible for rates and the rate</p> <p>10 design study we have ongoing.</p> <p>11 FITZGERALD, KC:</p> <p>12 Q. Right.</p> <p>13 MR. CHUBBS:</p> <p>14 A. Asset management reports through me through</p> <p>15 our director of engineering and distribution</p> <p>16 planning, similarly.</p> <p>17 FITZGERALD, KC:</p> <p>18 Q. They all report to you.</p> <p>19 MR. CHUBBS:</p> <p>20 A. Yes.</p> <p>21 FITZGERALD, KC:</p> <p>22 Q. Yes, okay. And just turning to the</p> <p>23 preparation for this GRA, which components</p> <p>24 of this were your direct responsibility?</p> <p>25 MR. CHUBBS:</p>	Page 24	<p>1 key topics, you know, to emphasize, right,</p> <p>2 in terms of operating costs, our labour</p> <p>3 efficiencies, some of the non-labour</p> <p>4 inflationary increases that we have seen</p> <p>5 over the last few years and going forward,</p> <p>6 the reliability of the electricity system</p> <p>7 and our performance would be another, our</p> <p>8 capital program and our focus on managing</p> <p>9 our capital costs would be another and</p> <p>10 certainly our customer program delivery in</p> <p>11 terms of reliability, in terms of customer</p> <p>12 service that we provide to our customers, so</p> <p>13 those would be areas of focus for me.</p> <p>14 FITZGERALD, KC:</p> <p>15 Q. I noticed this morning you mentioned, and</p> <p>16 Ms. London mentioned as well when she was on</p> <p>17 the stand, about the troublesome thing, I</p> <p>18 call it troublesome, but the issue of</p> <p>19 insurance seemed to be spiking or an area</p> <p>20 that was creating a concern for the company,</p> <p>21 and you mentioned that this morning in your</p> <p>22 testimony, correct?</p> <p>23 MR. CHUBBS:</p> <p>24 A. Yes, that's correct.</p> <p>25 FITZGERALD, KC:</p>

Page 25

1 Q. And I'm just going by memory now, Ms. London
 2 had indicated that that was an increase
 3 beyond Newfoundland Power's control and I
 4 believe that you indicated that's the case
 5 this morning as well.
 6 MR. CHUBBS:
 7 A. Yes, that's correct.
 8 FITZGERALD, KC:
 9 Q. But you also said, I think, that when it
 10 comes to the insurance and we don't have to
 11 go to the line item there, I believe the
 12 increase was, I think you said 12 percent
 13 over, from 2023 to 2025?
 14 MR. CHUBBS:
 15 A. That's the general inflationary increase
 16 that we saw, so when we looked back in 2021
 17 when we were preparing our rate application
 18 at that time, the forecast inflation that we
 19 had over the next few years, up to 2023,
 20 based on, you know, information that we had
 21 at the time, we expected to be around 5.8
 22 percent. What we actually saw over that
 23 period was around 18 percent, so that was 12
 24 percent higher on overall inflationary
 25 costs.

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1 FITZGERALD, KC:
 2 Q. Right, and insurance was a component of
 3 that.
 4 MR. CHUBBS:
 5 A. Yes, insurance was a component of that.
 6 FITZGERALD, KC:
 7 Q. So mentioning it here this morning, you
 8 know, when the GRA was being formulated, was
 9 thought put to that, saying, look, this is,
 10 it seems to me a lot of emphasis being put
 11 on the insurance increase, but if you go to
 12 Exhibit 3, I guess we can go there now and
 13 look at it, I think Exhibit 3 is Undertaking
 14 U-01, Attachment A. That may not be
 15 correct, bear with me for a moment. Yeah,
 16 no, that's not the correct one, there's a
 17 breakout of the insurance cost year over
 18 year from 2022 and I'm not sure exactly
 19 which exhibit that is on now.
 20 GREENE, KC:
 21 Q. It's PUB Information Request No. 2.
 22 FITZGERALD, KC:
 23 Q. Okay.
 24 GREENE, KC:
 25 Q. Schedule 5, Attachment 5, you will see it

Page 27

1 there, is one place.
 2 FITZGERALD, KC:
 3 Q. All right, thank you Ms. Greene. I don't
 4 think that's the right one.
 5 GREENE, KC:
 6 Q. No. It's PUB Information Request No. 2, the
 7 additional information. That's one place
 8 you'll see it in a nice orderly way from
 9 2022 to '26. Schedule B, Attachment 5.
 10 FITZGERALD, KC:
 11 Q. Okay, thank you. The line 15 there, you
 12 know, you got the annual cost as 2.3 million
 13 in 2022 and then it escalates, the forecast
 14 to 2.9. You know, when you look at all of
 15 the numbers, although I'm not saying it's
 16 not significant, it doesn't jump out at me
 17 as--it's obviously escalating, but it
 18 doesn't seem to be the main problem with,
 19 you know, I know it's a cumulative affect,
 20 but why isn't insurance being sort of
 21 isolated or red flagged, if you will, as—is
 22 it just used as an example of increased
 23 operating expenses?
 24 MR. CHUBBS:
 25 A. Yeah, like over the last few years our

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1 insurance costs have increased in double
 2 digit figures, so about 10 percent is what
 3 we saw from 2021 up to 2023. We've seen
 4 this, you know, annually year over year.
 5 These costs, you know, they're driven by
 6 what's going on in the market right now and
 7 they've been certainly a pressure for us in
 8 our last rate application and, you know, we
 9 see it as a potential future pressure for us
 10 as well.
 11 FITZGERALD, KC:
 12 Q. And I got the impression from Ms. London
 13 when she testified that the—and I think you
 14 repeated it this morning, that you believe
 15 or Newfoundland Power believes that they are
 16 getting the best available cost or price
 17 available or best coverage, or best price, I
 18 think, with their current provider. Did I
 19 hear you correct on that?
 20 MR. CHUBBS:
 21 A. Yes, that's correct.
 22 FITZGERALD, KC:
 23 Q. But she also said that really and the
 24 provider is AON Reed Stenhouse she
 25 testified, that is Fortis, the parent

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1 companies insurer and I believe she
 2 indicated that Newfoundland Power believes
 3 they are getting some economies by being a
 4 member, if you will, of the Fortis family
 5 and getting some breaks, so you agree with
 6 that, that’s generally what she said?
 7 MR. CHUBBS:
 8 A. Yes, that’s correct.
 9 FITZGERALD, KC:
 10 Q. And that’s what you understand as well.
 11 MR. CHUBBS:
 12 A. Yes, that’s correct.
 13 FITZGERALD, KC:
 14 Q. But she also said, of course, that there’s
 15 been no initiative by Newfoundland Power to
 16 go outside the AON Reed Stenhouse coverage,
 17 no one at Newfoundland Power is tasked as an
 18 operating expense, expenditure, cost saving
 19 initiative to check other providers of
 20 insurance and I believe she might have
 21 deferred that, because I asked her about
 22 that and she might have deferred that to you
 23 and would you confirm that that’s the case,
 24 no one is looking to see if there’s a better
 25 price out there at Newfoundland Power?

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1 (9:30 a.m.)
 2 MR. CHUBBS:
 3 A. So AON, our insurance broker that work on
 4 behalf of Fortis, so they’re taking Fortis
 5 insurance program to market. There are
 6 multiple insurers, as I understand it, that
 7 participate in that insurance program that
 8 provide insurance through the program, you
 9 know, so they’re working on behalf, they’re
 10 a third party working on behalf of Fortis as
 11 a broker, right.
 12 We did file, as part of, following Ms.
 13 London’s testimony, an undertaking that
 14 showed the last time we reviewed this, which
 15 would have been I think part of our last
 16 rate application, where we did a side-by-
 17 side comparison to show the insurance that
 18 we had, the coverage that we have under our
 19 existing program through the Fortis plan and
 20 AON used that coverage, compared it to what
 21 it would look like if Newfoundland Power
 22 were to go out on its own to seek the same
 23 coverage or coverage appropriate for
 24 Newfoundland Power, and I believe it showed
 25 that the cost would double if we were to go

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1 out on our own and seek our own insurance by
 2 ourselves, right.
 3 So the Fortis program gives us access
 4 to that broader market and we get a lower
 5 rate due to the geographic diversity, the
 6 lower risk that you get, you know, from a
 7 larger insurance program. So it definitely
 8 provides benefit to Newfoundland Power and
 9 to our customers.
 10 FITZGERALD, KC:
 11 Q. Right, which is the point, I guess, from our
 12 perspective, but this information, again,
 13 derives, the comparative analysis derives
 14 from your current provider, correct?
 15 MR. CHUBBS:
 16 A. The current broker, yes.
 17 FITZGERALD, KC:
 18 Q. The current broker, well there are other
 19 brokers in this geographic region, of
 20 course, you would agree?
 21 MR. CHUBBS:
 22 A. Yes, I would agree.
 23 FITZGERALD, KC:
 24 Q. So none of the other brokers have actually
 25 tested this information, correct?

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1 MR. CHUBBS:
 2 A. Yes, that’s correct.
 3 FITZGERALD, KC:
 4 Q. So would you know if Fortis itself, the
 5 parent, gets any benefit of adding
 6 Newfoundland Power to its, you know,
 7 coverage—sorry, that wasn’t worded
 8 correctly. Fortis is bringing Newfoundland
 9 Power to AON as a customer with, you know,
 10 2.3 million dollars per year in 2022. Do
 11 you think Fortis gets any advantage by
 12 bringing Newfoundland Power to AON Reed
 13 Stenhouse?
 14 MR. CHUBBS:
 15 A. I think all Fortis subsidiaries get an
 16 advantage of participating in the Fortis
 17 plan. I think you get that broader
 18 geographical diversity that allows that risk
 19 to be spread over multiple utilities, and as
 20 a result, the utilities participating in
 21 that plan get an overall rate and that lower
 22 overall rate gets passed on to the customers
 23 of those utilities, including Newfoundland
 24 Power’s customers. I’m not aware of any
 25 other benefit that would be provided to

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1 Fortis through Newfoundland Power
 2 participating in the plan and I think it's
 3 worth pointing out that Newfoundland Power's
 4 3 percent of Fortis, in terms of total
 5 assets, so I'm not sure that that 3 percent
 6 incremental increase of Newfoundland Power
 7 participating or not participating provides
 8 a broader benefit to Fortis. I can't see
 9 how that necessarily would work.

10 FITZGERALD, KC:
 11 Q. Sure, but neither one of us know, really.
 12 I've asked the question, but you wouldn't
 13 really know if there's any benefit or not?

14 MR. CHUBBS:
 15 A. No, I'm not aware of any benefit.

16 FITZGERALD, KC:
 17 Q. Just turning to another topic, Mr. Chubbs,
 18 if we could go to the transcript, June 14th,
 19 2024, page 53, and it's line 9. And Board
 20 counsel, Ms. Greene, is cross-examining Mr.
 21 Murray and she does a tally here of the
 22 increases that are pending in power costs
 23 and said "If we add all these up, we would
 24 get over 20 percent increase and if we add
 25 on the 2.25 to come from Hydro next year on

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1 July 1, arising from rate mitigation we're
 2 almost up to 23 percent." And Mr. Murray
 3 says, "That's correct". And then Ms. Greene
 4 goes on and asks a question, "Do you recall
 5 a rate increase being proposed by
 6 Newfoundland Power of that magnitude in such
 7 a short period of time?" And Mr. Murray
 8 says, "No." And then if you keep going
 9 further down, sorry, scroll a little
 10 further, page 55, line 4, "And are you aware
 11 that in the past the Board has considered a
 12 10 percent increase for customers as rate
 13 shock", again, this is a question from Ms.
 14 Greene, and Mr. Murray says, "Yes, I'm
 15 familiar with that." So you would agree
 16 with Mr. Murray that an increase of that
 17 amount does amount to a pending rate shock?

18 MR. CHUBBS:
 19 A. You know, I've seen the term "rate shock"
 20 used in a number of proceedings and, you
 21 know, the 10 percent number has been used
 22 and I think used by the Board at times too,
 23 have aligned with the term rate shock and
 24 yes, the increases over the next two years
 25 are in that range, yes.

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1 FITZGERALD, KC:
 2 Q. So from your perspective or what would your
 3 definition of rate shock be? What are the
 4 effects?

5 MR. CHUBBS:
 6 A. I'm not sure I could be any effects to rate
 7 shock, you know, it's a general term that's
 8 been used. I am not aware of anything that
 9 happens at 10 percent versus 9.5 or 10.5 or,
 10 you know, what would necessarily, what
 11 happens once you hit 10 percent. I think
 12 it's just a general level of rate increase
 13 that, you know, when you're getting into the
 14 territory of it's a big, one-time increase
 15 for customers.

16 FITZGERALD, KC:
 17 Q. But what is the impact on customers if
 18 they're encountering rate shock?

19 MR. CHUBBS:
 20 A. Well in terms of, I think you're getting
 21 into elasticity, is that –

22 FITZGERALD, KC:
 23 Q. Yeah, I mean I guess the point is you see,
 24 your department sees what Mr. Murray has
 25 identified as rate shock coming. Obviously

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1 that has to do with elasticity in sales, so
 2 at what point does your department says "we
 3 better get ready for this"?"

4 MR. CHUBBS:
 5 A. You know, we're continually looking at our
 6 forecast, our customer forecast, we
 7 incorporate the impacts of rate increases
 8 over time into those forecasts, just like
 9 other increases and decreases in terms of,
 10 you know, general sales, customer growth,
 11 electrification, all those matters, so we
 12 continually build those into our customer
 13 forecasting. So we do that on a regular
 14 basis, so in terms of getting ready, I'm not
 15 quite sure where you're going there.

16 FITZGERALD, KC:
 17 Q. Well you see, I guess the rate shock that's
 18 been identified, I mean if 10 percent, an
 19 increase in rates, is generally regarded as
 20 going to create a rate shock and therefore
 21 elasticity in prices, but we're actually at
 22 a level of 20 percent, I would have thought
 23 that alarm bells might be doing off at
 24 Newfoundland Power as to, you know, price
 25 elasticity and are there any preparations

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1 being made for what, you know, as a
 2 layperson I could expect is going to occur
 3 with a rate shock of this magnitude?
 4 MR. CHUBBS:
 5 A. I mean, Newfoundland Power is certainly
 6 aware of the rate increases and pressures
 7 that are occurring right now. When you look
 8 at that 20 percent or so, a large portion of
 9 that is related to our supply cost, right,
 10 and this issue with the wholesale rate and
 11 such. In terms of Newfoundland Power, you
 12 know, we are continually focused on managing
 13 our costs through efficient operations,
 14 reducing our costs, labour costs where we
 15 can and we continually do that over time.
 16 We have a lot of programs out there to
 17 support our customers in terms of, you know,
 18 who may be concerned about rate pressures,
 19 whether that's flexible payment arrangements
 20 for customers or providing customers with
 21 energy efficiency tips or we have programs
 22 that are available for our customers in
 23 terms of support and rebates for things like
 24 insulation and programmable thermostats and
 25 programs like that to support customers who

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1 may be having a challenging time with their
 2 electricity bills.
 3 FITZGERALD, KC:
 4 Q. Sure. Would you think that this Board, the
 5 Public Utilities Board would have any role
 6 in this anticipated rate shock? For
 7 example, would you be surprised in the Board
 8 had a hard look at controllable expenses
 9 within Newfoundland Power to mitigate the
 10 pending rate shock?
 11 MR. CHUBBS:
 12 A. The costs that we have put forward in our
 13 application are the reasonable costs that we
 14 feel are necessary to operate the
 15 electricity system. These are all costs
 16 that are based on our experience, our
 17 operating experience historically, we've
 18 incorporated the effects of inflation in our
 19 costs, any known and manageable changes in
 20 our costs.
 21 And in our view, the costs that
 22 Newfoundland Power have included in our rate
 23 application are costs that are required to
 24 provide reliable service to our customers in
 25 an environmentally responsible manner at the

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1 lowest possible cost. So we feel that what
 2 we have put, included in our application, is
 3 appropriate and is reasonable.
 4 FITZGERALD, KC:
 5 Q. Again, that of course is your position, but
 6 I guess the, my question is would you be
 7 surprised if what you regarded as
 8 reasonable, your controllable costs I'm
 9 talking about now, any portion of them would
 10 be disallowed by the Board in the
 11 environment that we're in?
 12 MR. CHUBBS:
 13 A. I that, you know, in this hypothetical
 14 scenario, I think I'd have to understand
 15 what costs were disallowed and why before I
 16 could gauge my reaction. I do feel though
 17 the costs are reasonable and appropriate.
 18 FITZGERALD, KC:
 19 Q. So the cost of service model that is
 20 included in the GRA, what inputs to that
 21 cost of service model were provided by your
 22 division?
 23 MR. CHUBBS:
 24 A. You know, Mr. Comerford would be best to
 25 speak to cost of service and cost of service

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1 model, he's covering, you know, cost of
 2 service as part of his evidence.
 3 (9:45 a.m.)
 4 FITZGERALD, KC:
 5 Q. Okay. Can we have a look at Newfoundland
 6 Power's Rebuttal Evidence, this is the
 7 document that was filed on the 28th of May,
 8 2024, so Mr. Chubbs, this is testimony, it's
 9 evidence, do you adopt this evidence as
 10 yours or Newfoundland Power's?
 11 MR. CHUBBS:
 12 A. This is Newfoundland Power's Rebuttal
 13 Evidence, yes.
 14 MR. O'BRIEN:
 15 Q. Mr. Chair, I've had a discussion with
 16 counsel this morning, Mr. Comerford intends
 17 to adopt this evidence as part of his
 18 testimony, but I have no objection to any
 19 questions that Mr. Chubbs may be able to
 20 answer at this point, so subject to that
 21 proviso.
 22 CHAIR:
 23 Q. Okay.
 24 FITZGERALD, KC:
 25 Q. Thank you. But you have—you are familiar

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1 with this evidence, though, Mr. Chubbs, are
 2 you?
 3 MR. CHUBBS:
 4 A. Yes, I am.
 5 FITZGERALD, KC:
 6 Q. Okay, can we go to page 18? This comment
 7 kind of jumped out at line 9, it says—well
 8 it starts at line 8, it says, “The Bowman
 9 evidence did not provide comprehensive
 10 studies, jurisdictional comparisons or
 11 customer benefit and cost analysis to
 12 support its recommendations. Overall the
 13 recommendations appear to be primarily based
 14 on Mr. Bowman’s opinion of certain
 15 information on the record of this
 16 proceeding, as well as his prior work
 17 experience and engagements.” And was that
 18 last sentence, was that a criticism of Mr.
 19 Bowman’s methodology?
 20 MR. CHUBBS:
 21 A. I don’t think I can really speak to that
 22 statement. I think that’s better for Mr.
 23 Comerford to cover. He would have been
 24 closer to Mr. Bowman’s evidence and the
 25 review of his evidence.

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1 FITZGERALD, KC:
 2 Q. Sure, okay, fair enough. I mean, as I read
 3 it, you know, the recommendation is
 4 primarily based on Mr. Bowman’s opinion of
 5 certain information on the record of this
 6 proceeding, as well as prior work, I don’t
 7 know what else it would be based on, would
 8 you? I mean, he was required to examine and
 9 analyze the record of the proceeding, that’s
 10 what his evidence was based on.
 11 MR. CHUBBS:
 12 A. Yes, and you know, the statement is, you
 13 know, prior to that, talks about any other
 14 studies or jurisdictional scans that may
 15 have been provided as part of the evidence.
 16 So, it’s difficult sometimes to assess
 17 where, you know, an expert such as Mr.
 18 Bowman might be coming from in some of these
 19 recommendations. So, you know, I think that
 20 would be the basis of it. But again, I
 21 think Mr. Comerford would have been closer
 22 to reviewing the evidence and his
 23 submission. So, I’ll leave it to him to get
 24 into detail on it.
 25 FITZGERALD, KC:

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1 Q. Okay. Well then, let’s look then at page 20
 2 of the rebuttal evidence, and line 6 says,
 3 “Newfoundland Power proposes changes to its
 4 customer rate structures based on
 5 comprehensive reviews”. Now, is this going
 6 – a topic that Mr. Comerford is going to be
 7 talking about or can I ask you questions on
 8 this or should I ask you questions on this?
 9 MR. CHUBBS:
 10 A. Again, Mr. Comerford is closest to this in
 11 terms of rate design and the rate design
 12 review, and he certainly can speak to this
 13 at length, but feel free to ask a question
 14 and -
 15 FITZGERALD, KC:
 16 Q. Okay. We’ll give it a go.
 17 MR. CHUBBS:
 18 A. Okay.
 19 FITZGERALD, KC:
 20 Q. So, can you confirm that Newfoundland Power
 21 proposes to increase each component of each
 22 of its retail rates by the proposed rate
 23 increase of 5.5 percent?
 24 MR. CHUBBS:
 25 A. I think generally they’re all around the

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1 same amount. Off the top of my head, I feel
 2 like there’s one that’s different, but I
 3 can’t specifically recall.
 4 FITZGERALD, KC:
 5 Q. Which of the ones you’re talking about,
 6 which component are you thinking might be
 7 different?
 8 MR. CHUBBS:
 9 A. Actually that’s not – it’s not coming to my
 10 mind right now, sorry, but they’re all
 11 generally moving around the same amount,
 12 yes.
 13 FITZGERALD, KC:
 14 Q. Okay. All right. Were any alternative
 15 retail rate options considered to recover
 16 the proposed increase in revenues?
 17 MR. CHUBBS:
 18 A. We were completing this rate design review.
 19 Right now we’re in the midst of that review
 20 and any alternative rate designs, I think
 21 would be appropriate to wait until that
 22 review is completed. You know, at the same
 23 time, right now, I mean, we’re in the midst
 24 of a big change in the electricity sector.
 25 We’re seeing embedded cost change as a

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1 result of Muskrat Falls. We're seeing
 2 changes in our wholesale rate occurring
 3 right now, and again, we're in the midst of
 4 a review. So, this rate application, in our
 5 view, was not the appropriate time to be
 6 changing rate design and we certainly want
 7 to see the outcome of this review, the
 8 results of that before we start implementing
 9 those designs and ensuring that we're
 10 considering the impact on all customers when
 11 you change rates. It's not something you
 12 want to do without, you know, a
 13 comprehensive review.
 14 FITZGERALD, KC:
 15 Q. Right. So, and I guess you'd have the same
 16 answer if I – you know, if I asked you, you
 17 know, had you guys – or Newfoundland Power,
 18 sorry, considered, you know, a deferral
 19 account for these rate changes. I guess you
 20 would – that would be another method of
 21 collecting the revenue financially.
 22 MR. CHUBBS:
 23 A. What kind of deferral account? Specifically
 24 what cost would be in that deferral account?
 25 FITZGERALD, KC:

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1 Q. Well, you know, no change in rates, did you
 2 consider not changing the rates at all but
 3 recovering any approved revenue increase via
 4 a deferral account?
 5 MR. CHUBBS:
 6 A. So, you're meaning recovering those costs
 7 from customers in the future?
 8 FITZGERALD, KC:
 9 Q. Yeah.
 10 MR. CHUBBS:
 11 A. Is that what you're getting at? I mean, we
 12 operate under a cost-of-service model.
 13 We're a cost-of-service jurisdiction. You
 14 know, under our regulatory processes, you
 15 know, we collect those costs from customers
 16 under that model and, you know, deferring a
 17 cost like that, you know, you're getting
 18 into the intergenerational equity, right,
 19 and whether that's appropriate or not. So,
 20 it's not something that we've considered
 21 here.
 22 FITZGERALD, KC:
 23 Q. Okay. So, but obviously, you know, you've
 24 put forward this 5.5 percent increase and
 25 there was some thought process here because

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1 it says that. In the rebuttal evidence it
 2 says, "Newfoundland Power proposes changes
 3 to its customer rate structures based on
 4 comprehensive reviews". So, we take that to
 5 mean that prior to putting forward the 5.5
 6 percent ask that there was a comprehensive
 7 review undertaken, and is that the case?
 8 MR. CHUBBS:
 9 A. We're talking comprehensive review here.
 10 We're talking about changing rate structure.
 11 So, we're talking about, you know, adding
 12 additional blocks to rates. You're talking
 13 time of use rates, critical peak pricing,
 14 you know, increasing blocks, declining
 15 blocks, all those types of things. So, in
 16 terms of rate structure, our rate structures
 17 are the same. There's no comprehensive
 18 review completed because these are the rate
 19 structures we operate under. What we're
 20 talking about here is whether we may want to
 21 change those rate structures, you know,
 22 because of the change we've seen in the
 23 electricity sector, because of the changes
 24 in the wholesale rates and the marginal cost
 25 that we're seeing, and this is why we're

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1 completing this comprehensive review right
 2 now. That takes time and you need to be
 3 thoughtful of things. Like for example, you
 4 know, if you were to put in a second block,
 5 a lower second block for customers, that
 6 would impact customers differently depending
 7 on the usage of that customer. So, a
 8 customer with say a very large home and
 9 consumed a lot of electricity, they might
 10 see their bill go down because they're
 11 getting a – taking advantage of that second
 12 block of energy, if they have high
 13 consumption, where a customer in a smaller
 14 home who doesn't use as much energy in that
 15 home may be focused more on conservation,
 16 they would see that first higher block, you
 17 know. So, you need to really be considerate
 18 to the impacts on your customers when you're
 19 implementing new rates and rate structures.
 20 FITZGERALD, KC:
 21 Q. Okay. So, well, you've put forward a
 22 request to increase each component of each
 23 retail rate by 5.5 percent. So, you know,
 24 and I take it that – I don't want to put
 25 words in your mouth, but there was no

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1 comprehensive review undertaken prior to
 2 that being put forward, but there is an
 3 affect on each of the components by asking
 4 for a 5.5 percent increase across the board.
 5 MR. CHUBBS:
 6 A. Yes, I mean that would be consistent with
 7 all of our rate applications historically,
 8 and again, you know, our rate structures are
 9 as they are. Changing rate structures is a
 10 whole different thing. That’s where you
 11 need to really consider the impacts on your
 12 customers and you would want to complete
 13 that review.
 14 FITZGERALD, KC:
 15 Q. Okay. So, just – and maybe this is Mr.
 16 Comerford’s area. I understand that
 17 Newfoundland Power’s tail-block energy
 18 charges are already well above marginal
 19 energy costs. Is that true?
 20 MR. CHUBBS:
 21 A. Yes, and I think Mr. Comerford certainly
 22 would be the best to speak to that.
 23 FITZGERALD, KC:
 24 Q. So, but that component, tail-block energy
 25 charge, that’s going to be increased by 5.5

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1 percent. So, that’s going to take them even
 2 further away from marginal energy costs?
 3 MR. CHUBBS:
 4 A. I think it’s best for Mr. Comerford to speak
 5 to the specifics of that.
 6 FITZGERALD, KC:
 7 Q. So, generally, does Newfoundland Power
 8 believe that the wholesale rate, which is
 9 being worked on, should reflect marginal
 10 cost to improve the efficiency of the
 11 pricing? That’s the principle behind that I
 12 understand.
 13 MR. CHUBBS:
 14 A. Yes, that’s the general idea. The wholesale
 15 rate that we receive today from Newfoundland
 16 and Labrador Hydro is based on the
 17 historical wholesale rate which is driven by
 18 fuel cost at Holyrood being the marginal
 19 cost. Whereas today, the fact that we’re
 20 interconnected to the national grid,
 21 marginal cost really reflect energy costs on
 22 the open market. So, they’re lower compared
 23 to Holyrood.
 24 FITZGERALD, KC:
 25 Q. So, shouldn’t the retail rates reflect

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1 marginal cost to improve the efficiency of
 2 the price signal?
 3 MR. CHUBBS:
 4 A. I think that’s something that we need to
 5 complete this review to fully understand.
 6 FITZGERALD, KC:
 7 Q. Page 20 again of your rebuttal evidence, and
 8 again, we’re talking about the – line 10,
 9 talking about this comprehensive review and
 10 then at line 12, it says, “for example,
 11 establishing a declining block rate
 12 structure for domestic customers, as
 13 recommended by Mr. Bowman, may encourage
 14 customers to consume more energy during
 15 winter peak periods when capacity on the
 16 Island Interconnected system is limited.”
 17 So, currently though, there are rates for
 18 general service customers that have a
 19 declining block rate structure? Isn’t that
 20 correct?
 21 MR. CHUBBS:
 22 A. Yes, that’s correct.
 23 FITZGERALD, KC:
 24 Q. And Newfoundland Power’s proposing a
 25 continuation of that or for general service

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1 customers?
 2 MR. CHUBBS:
 3 A. Yes, that’s correct.
 4 FITZGERALD, KC:
 5 Q. So, what’s the difference if it’s okay for
 6 general service customers?
 7 MR. CHUBBS:
 8 A. So, the declining block structure now for
 9 general service actually reflects the energy
 10 costs on the electricity system more closely
 11 now than what our current wholesale rate
 12 cost does, and I believe in the report from
 13 Christensen, the phase one report of this
 14 review, identified that the current rate
 15 structure we have today are actually fairly
 16 suitable. It sets us up for the wholesale
 17 rate marginal costs that are coming; that
 18 are actually being experienced on the system
 19 right now. So that declining block rate
 20 might make sense.
 21 FITZGERALD, KC:
 22 Q. Might make sense for the general service?
 23 MR. CHUBBS:
 24 A. Yeah. And again, we’ll see what comes out
 25 of this review and whether, you know, that

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1 continues to be appropriate for general
 2 service customers or not. But it's
 3 something we need to fully review and fully
 4 understand.
 5 FITZGERALD, KC:
 6 Q. Just turning to the load research study that
 7 was negotiated the last GRA and it's
 8 referred to in the rebuttal evidence at page
 9 21 and referring to response to a PUB RFI
 10 there. It stated here that "the response
 11 explained" – that is Newfoundland Power's
 12 response – "explained that the necessary
 13 meters were delayed due simply to the supply
 14 chain constraints which have impacted the
 15 utility industry in recent years". And the
 16 Load Research Study was part of the
 17 settlement agreement back in 2023 – or 2022,
 18 correct?
 19 MR. CHUBBS:
 20 A. Yes, that's correct.
 21 FITZGERALD, KC:
 22 Q. And I guess you're saying – you go on to say
 23 at page 21 – I lost my – yeah, no, at page
 24 11. "Bowman evidence recommends that
 25 Newfoundland Power give highest priority to

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1 the Load Research Study." We're three years
 2 on and nothing's really occurred, but you
 3 indicate that that's because of the supply
 4 chain issue. Is that the only reason why
 5 the Load Research Study wasn't – isn't
 6 progressing?
 7 MR. CHUBBS:
 8 A. Well, that's a large part of it. I mean,
 9 you need the meters to be able to conduct
 10 load research to get that granular data that
 11 our current meters cannot currently collect.
 12 So, we can't really complete a Load Research
 13 Study without the appropriate meters to
 14 gather the data that we need. So, that
 15 takes time and like many things, meters are
 16 experiencing supply chain delays and issues
 17 and these have impacted this study. Mr.
 18 Comerford can speak to anything outside of
 19 that that may have impacted the schedule,
 20 but as I understand it, the large part of it
 21 has been the delivery of the meters to
 22 complete the load research.
 23 (10:00 a.m.)
 24 FITZGERALD, KC:
 25 Q. During this period, while you were suffering

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1 from this supply chain deficit, was
 2 Newfoundland Power able to procure other
 3 meters for its use or was the supply chain
 4 issue specific to the meters that you were
 5 looking for for the load research?
 6 MR. CHUBBS:
 7 A. We haven't had any issues with meters, our
 8 regular AMR meter deliveries. Those would
 9 be largely routine deliveries for
 10 Newfoundland Power. These load research
 11 meters, you know, you're talking about a
 12 small number of meters specific for
 13 Newfoundland Power that when we speak to our
 14 meter supplier, they have – because of their
 15 other meter orders that they have, they
 16 haven't been able to get those in the
 17 assembly line essentially to get them
 18 delivered to Newfoundland Power. So, they
 19 have a backlog of orders, including
 20 Newfoundland Power, but other customers that
 21 they're delivering meters and we weren't
 22 able to – you know, or it's taken time to
 23 get these meters produced for Newfoundland
 24 Power.
 25 FITZGERALD, KC:

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1 Q. And that's a different type of meter you're
 2 talking about now? Is that -
 3 MR. CHUBBS:
 4 A. That's right, yeah. So, you know, the
 5 meters we have today are what we call AMR
 6 meters, automatic meter reading. They
 7 essentially produce a read – they gather
 8 your monthly reading, produce that one
 9 monthly reading for billing purposes,
 10 whereas these load research meters would be
 11 collecting interval data, you know, on 15-
 12 minute interval data, so they could collect,
 13 gather a lot more information and that
 14 information needs to be collected from the
 15 meter itself. So, it's a different type of
 16 meter, a bit more specialized.
 17 FITZGERALD, KC:
 18 Q. And they're harder to get than the AMR?
 19 MR. CHUBBS:
 20 A. I don't know if it's fair to say that
 21 they're harder to get. I mean, you know,
 22 these types of meters and AMR meters, you
 23 know, are routine meters, but this was a
 24 special order of a small batch of meters for
 25 Newfoundland Power for this specific purpose

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1 and our meter manufacturer/supplier aren't
 2 able to meet that order in I'll say our
 3 traditional delivery time timeframe. So, as
 4 a result, this has delayed the Load Research
 5 Study.
 6 FITZGERALD, KC:
 7 Q. Okay. So, the statement there where it
 8 says, "Mr. Bowman's recommendation to give
 9 highest priority to the Load Research Study
 10 is redundant in consideration of the
 11 company's ongoing efforts". I would take
 12 the inference from that is that Newfoundland
 13 Power is giving the Load Research Study the
 14 highest priority. Would you agree with
 15 that?
 16 MR. CHUBBS:
 17 A. Yes, it is a high priority for us to deliver
 18 this Load Research Study. It's something we
 19 want to complete. Right now we're into the
 20 practical effects of meter delivery delaying
 21 the study and it's not much that
 22 Newfoundland Power can do right now to
 23 advance it anymore quickly than is currently
 24 occurring.
 25 FITZGERALD, KC:

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1 Q. So, is there a particular source where
 2 you're getting the meters that you need from
 3 or not getting from – not getting them yet,
 4 but you have a contract out for these?
 5 MR. CHUBBS:
 6 A. Yeah, so Newfoundland Power's meter supplier
 7 is Itron. They are, as I understand, the
 8 largest meter manufacturer in North America,
 9 and if not the largest, certainly one of the
 10 top meter manufacturers. And I believe the
 11 meters that we've ordered are Itron meters.
 12 I, you know, stand to be corrected that
 13 they're not coming from another
 14 manufacturer. I'm fairly certain they're
 15 Itron meters.
 16 FITZGERALD, KC:
 17 Q. And they're based out of where?
 18 MR. CHUBBS:
 19 A. I'm not sure. I don't know where Itron is
 20 based out of.
 21 FITZGERALD, KC:
 22 Q. But there's a contract let at some point
 23 between Newfoundland Power and Itron meters
 24 for these load research meters?
 25 MR. CHUBBS:

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1 A. Yes, and Mr. Comerford can give you more
 2 details on that, but yes, the meters are
 3 ordered. We're just waiting on delivery.
 4 FITZGERALD, KC:
 5 Q. Okay. Would you know when they were
 6 ordered?
 7 MR. CHUBBS:
 8 A. No, I do not.
 9 FITZGERALD, KC:
 10 Q. Would you be able to approximate since 2020?
 11 Would it have been 2022? If you don't know,
 12 you don't know, but I mean, if you could
 13 approximate? If it came past your desk and
 14 you can recall, perhaps you could tell us.
 15 MR. CHUBBS:
 16 A. No, I can't recall. Mr. Comerford will be
 17 able to speak to it certainly.
 18 FITZGERALD, KC:
 19 Q. Just turning to another topic, Mr. Chubbs,
 20 and I don't know if we have to go to P.U.5
 21 (2019), but we might as well be ready, and
 22 I'll ask you general questions and if you
 23 can't recall, then we'll go to it, but this
 24 was the Board order dated February 19th, 2019
 25 and it was approval for 4.6 million for the

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1 Long Pond Substation. Do you recall that
 2 order?
 3 MR. CHUBBS:
 4 A. I recall getting the order.
 5 FITZGERALD, KC:
 6 Q. Okay. So, you're not going to dispute that
 7 that in fact occurred; that the Board did
 8 approve a 4.6-million-dollar amount for the
 9 Long Pond Substation. We know that as a
 10 fact.
 11 MR. CHUBBS:
 12 A. Yes, that's correct.
 13 FITZGERALD, KC:
 14 Q. Right. And would you also know as a fact
 15 that that amount, 4.6 was fully contributed
 16 by the customer, being MUN, because the
 17 substation was deemed to be a special
 18 facility?
 19 MR. CHUBBS:
 20 A. Yes, that's correct.
 21 FITZGERALD, KC:
 22 Q. Okay. Do you know when that substation was
 23 declared in service?
 24 MR. CHUBBS:
 25 A. I can't recall the specific date. It would

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1 have been in – would have been within, you
 2 know, a year and a half or so of the order.
 3 FITZGERALD, KC:
 4 Q. So, 2020 or 2021?
 5 MR. CHUBBS:
 6 A. Yes.
 7 FITZGERALD, KC:
 8 Q. And you would recall as well that on
 9 February – in February 2023, Newfoundland
 10 Power filed an application for an upgrade to
 11 that substation for 3.3 million dollars?
 12 MR. CHUBBS:
 13 A. An expansion to the substation, yes.
 14 FITZGERALD, KC:
 15 Q. Was it an expansion or was it a replacement
 16 of a transformer?
 17 MR. CHUBBS:
 18 A. We're talking Long Pond substation?
 19 FITZGERALD, KC:
 20 Q. Yes.
 21 MR. CHUBBS:
 22 A. It was an expansion of the substation. So,
 23 Long Pond substation was requested by
 24 Memorial University to provide a redundant
 25 feed on the backside say of the university,

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1 and then the subsequent project was related
 2 to the new boilers that MUN are installing,
 3 the electric boilers that MUN are installing
 4 at their facilities and so that increased
 5 capacity required a second power transformer
 6 and extension to the substation to serve
 7 that load. So, the current – the
 8 transformer that was installed say in 2021
 9 is still there as a redundant transformer
 10 that was funded by the university.
 11 FITZGERALD, KC:
 12 Q. So, it's redundant, and I don't know the
 13 term of art, does that mean it's stranded or
 14 of no use or is it – it's still in use, the
 15 old transformer?
 16 MR. CHUBBS:
 17 A. Yes.
 18 FITZGERALD, KC:
 19 Q. Or the relatively old transformer. It's
 20 relatively new, but the first transformer.
 21 MR. CHUBBS:
 22 A. Right. So, it's not stranded. Redundant
 23 meaning a backup supply for the university.
 24 So, they can use it for their own purposes
 25 in terms of, you know, the university's

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1 system is interconnected. They can move
 2 load from one – from buildings from the
 3 current MUN substation to the Long Pond
 4 substation for their own purposes, for work
 5 that they need to do or for any reason, you
 6 know, we couldn't serve the load from MUN
 7 substation, we could serve it through Long
 8 Pond substation. So, it serves a second
 9 supply, redundant backup supply for the
 10 university.
 11 FITZGERALD, KC:
 12 Q. Okay, thank you. And we understand that
 13 that 3.3 million dollars was not paid by the
 14 customer. That's paid by the ratepayers,
 15 correct?
 16 MR. CHUBBS:
 17 A. For the second application, the second
 18 project, we have a contribution in aid of
 19 construction policy and when customers, you
 20 know, are adding to facilities, when
 21 customers are connecting to the grid, we
 22 look at what is the cost to connect that
 23 customer to the grid and we look at the
 24 revenue that we will receive from that
 25 customer through the additional sales as

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1 well. And for MUN substation, converting
 2 their boilers from oil to electric is a
 3 significant increase in electricity
 4 consumption, an increase in sales and
 5 through our CIC application, which was
 6 approved by the Board, it was determined
 7 that there was no requirement for a
 8 contribution from the university because of
 9 the increased revenue from Memorial
 10 University would essentially pay for the
 11 cost of that substation expansion. That's
 12 the same as we treat, you know, any other
 13 general service customers or residential
 14 customers for that matter. So, if you're
 15 connecting to the grid and let's say for
 16 example, you know, we need to build five
 17 kilometres of line to hook one home to the
 18 grid, we would expect that we wouldn't
 19 collect enough revenue potentially from that
 20 home to pay for that large line extension.
 21 So that cost would be incurred by the
 22 customer. Whereas if you're putting a new
 23 home in a subdivision or near existing
 24 infrastructure and we've only got to put in
 25 a pole or two to connect you, under our CIC

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1 policy, we look at the revenue we're going
 2 to collect and what the cost of that pole is
 3 or those poles and if it's offsetting, then
 4 there is no contribution from the customer.
 5 So, this is a longstanding policy we've had
 6 in place at Newfoundland Power for a lot of
 7 years and again, you know, for MUN, that was
 8 reviewed by the Board and approved by the
 9 Board.
 10 FITZGERALD, KC:
 11 Q. I realize that, but in this case, this is
 12 more than a line. This is a 3.3-million-
 13 dollar capital project that was not paid for
 14 by the customer for the reasons that you
 15 just explained and was there any – so, was
 16 there a study done -
 17 MR. O'BRIEN:
 18 Q. Mr. Chair, I'm not certain that's what the
 19 evidence was. The additional revenue paid
 20 for it. So, to say it is not paid by the
 21 customer, Mr. Chubbs didn't say that.
 22 CHAIRMAN:
 23 Q. Mr. Chubbs can clarify his response on that
 24 if he wants to.
 25 FITZGERALD, KC:

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1 Q. Right.
 2 CHAIRMAN:
 3 Q. Whether he agrees or not with Mr.
 4 Fitzgerald's statement.
 5 MR. CHUBBS:
 6 A. Yes. So again, you know, the customer, in
 7 terms of Memorial University, our sales to
 8 Memorial University are going to increase.
 9 We're going to collect from Memorial
 10 University more revenue over the life of
 11 that asset, during the life of that asset,
 12 that offsets the initial capital investment
 13 to put the substation in place. So, because
 14 of that, there's no requirement for Memorial
 15 University to pay a contribution to the
 16 substation. Now, had the expansion, you
 17 know, been – the cost been higher or their
 18 consumption being lower, right, in that
 19 analysis, there may have been a
 20 contribution, maybe a partial contribution.
 21 So, it really depends on what the cost of
 22 the expansion is and it depends on the
 23 increased revenue you're going to get from
 24 that customer. So, that's how our CIC
 25 policy works and that's – again, that's a

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1 longstanding policy and this one was
 2 reviewed by the Board, approved by the Board
 3 and determined that the increased revenue
 4 from Memorial University more than offset
 5 the cost to build the substation.
 6 FITZGERALD, KC:
 7 Q. Is that based on the condition present that
 8 the boilers actually get trans – swapped out
 9 or is that – or I should ask this. Do you
 10 know if the conversion has taken place yet?
 11 MR. CHUBBS:
 12 A. I know the project is ongoing. I know the
 13 completion date has moved a few times. It's
 14 been delayed but they're in the midst of
 15 completing the project, yes.
 16 FITZGERALD, KC:
 17 Q. Right. So, there is no cash flowing yet to
 18 pay for the 3.3, if you want to look at it
 19 that way. The capital cost has been
 20 incurred of the 3.3. There's no revenue yet
 21 that could be identified that's flowing back
 22 to pay for the 3.3 yet?
 23 MR. CHUBBS:
 24 A. Yeah, the boilers are not installed yet.
 25 The project's not completed yet.

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1 FITZGERALD, KC:
 2 Q. Is that – does that comply with the CIAC? I
 3 mean, it sounds to me – I mean a little bit,
 4 maybe not speculative, but you're hoping
 5 that this transfer will take – you know,
 6 that there won't be a change in the
 7 administration, won't be a change in the
 8 policy of MUN not to do the conversion.
 9 Because if they, that third party does that
 10 decision – makes that decision, then you're
 11 not getting the same revenue to pay for the
 12 3.3 million bucks. Would you agree?
 13 (10:15 a.m.)
 14 MR. CHUBBS:
 15 A. I mean, there's a certain set of assumptions
 16 that you have to put in for a project like
 17 that. I mean, you know, we're working – our
 18 engineers are working with MUN's engineers
 19 to understand what the demand, what the
 20 consumption of those boilers are going to be
 21 over their life and it's been fully, you
 22 know, reviewed by our engineering team.
 23 We're confident that the sales are what
 24 they're going to be. The demands on the
 25 system is what it's going to be and we're

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1 certainly comfortable with all that. In
 2 terms of timing of the project, you know,
 3 Memorial University would be subject to the
 4 same supply chain issues that we're seeing,
 5 but we're only talking about, you know, a
 6 year or two on what's a 50-year asset at the
 7 end of the day. So, you know, we are
 8 certainly comfortable with the set of
 9 assumptions. We know the project is ongoing
 10 and expected to be complete within the next
 11 year or so.
 12 FITZGERALD, KC:
 13 Q. Sure. But I guess the answer to the
 14 question would be that that is out of your
 15 control somewhat when the revenue starts
 16 flowing as a result of the boiler transfer.
 17 It's a third party has control of that
 18 situation, not Newfoundland Power, correct?
 19 MR. CHUBBS:
 20 A. Yes, I would agree with that, yes.
 21 FITZGERALD, KC:
 22 Q. And we would also, I guess, in your
 23 experience you've seen projects, you know,
 24 some projects get mothballed, some projects
 25 don't go ahead because of funding problems.

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1 Would you agree with that?
 2 MR. CHUBBS:
 3 A. Yes, some projects do get mothballed at
 4 times, yes.
 5 FITZGERALD, KC:
 6 Q. Okay. So, there is some risk, if you will,
 7 that the rates from the consumption from MUN
 8 will not be enough to cover for this – or to
 9 pay for the Long Pond substation? If I
 10 could put it another way, you are taking a
 11 risk?
 12 MR. CHUBBS:
 13 A. Again, if we look at – we get the
 14 appropriate guarantees, I think, from the
 15 customer that these projects are going ahead
 16 and in terms of risks, you know, Mr.
 17 Comerford is certainly well tuned to speak
 18 about MUN. He was very close to the CIAC
 19 calculation and the agreement with the
 20 university and I can't speak to it, so he
 21 might be better to speak to anything that's
 22 built into that contract, in terms of if the
 23 load doesn't materialize, whether that
 24 customer – that cost gets passed onto that
 25 customer. So, I would think Mr. Comerford

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1 could address that.
 2 FITZGERALD, KC:
 3 Q. Okay. So, we do know though that the 3.3 or
 4 the Long Pond substation, the total cost,
 5 and I'm going to throw this number at you,
 6 you can dispute it, I think 9.3 million
 7 dollars was spent on the Long Pond
 8 substations between the two? Would that be
 9 in the ballpark?
 10 MR. CHUBBS:
 11 A. Two substations?
 12 FITZGERALD, KC:
 13 Q. Well, sorry, there was the 4.6 for the Long
 14 Pond substation. There's 3.3 for the
 15 replacement transformer at Long Pond and
 16 there's 1.6 for the MUN T-2 replacement.
 17 MR. CHUBBS:
 18 A. Yeah, so MUN T-2, which is at MUN
 19 substation, not Long Pond substation.
 20 FITZGERALD, KC:
 21 Q. Okay, sorry. So, that totals 9.3?
 22 MR. CHUBBS:
 23 A. That sounds accurate, yes.
 24 FITZGERALD, KC:
 25 Q. Right. And that amount of course is in

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1 Newfoundland Power's rate base?
 2 MR. CHUBBS:
 3 A. It would be in Newfoundland Power's rate
 4 base but the offsetting contribution for the
 5 redundant facility, the Long Pond project,
 6 so the 4.6 would be a negative impact on the
 7 rate base. So that would be taken out. So,
 8 it would really be the second transformer at
 9 Long Pond and of course, the replacement of
 10 the transformer at MUN that would be fully
 11 reflected in rate base. I'm getting into
 12 accounting matters here now, so I may be a
 13 little off here, but this is how I
 14 understand it, right.
 15 FITZGERALD, KC:
 16 Q. Okay. So, back out the 4.6 from what I –
 17 the 9.3 number that I threw at you, which
 18 would leave whatever that math, but there is
 19 a component, the substations are in fact in
 20 rate base?
 21 MR. CHUBBS:
 22 A. Yes, that's correct.
 23 FITZGERALD, KC:
 24 Q. Right.
 25 MR. CHUBBS:

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1 A. I would agree with that.
 2 FITZGERALD, KC:
 3 Q. And if MUN had to pay for those themselves,
 4 then obviously they would not be in rate
 5 base.
 6 MR. CHUBBS:
 7 A. That's correct.
 8 FITZGERALD, KC:
 9 Q. Just you mentioned the connection policy.
 10 Can you just give us a high-level view of
 11 what happens – you know, walk us through the
 12 process of, you know, when Newfoundland
 13 Power takes on a new general – large general
 14 service customer. Do you make a
 15 determination where to connect, what the
 16 costs are and what's to be borne by the
 17 customer?
 18 MR. CHUBBS:
 19 A. Yeah. I mean, if a new large general
 20 service customer is looking to connect to
 21 our system, you know, they reach out to
 22 Newfoundland Power typically through our
 23 contact centre. They're put in contact with
 24 typically the technologist who's responsible
 25 for that area. That technologist would

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1 complete a site visit, understand the
 2 infrastructure that's there, what – they
 3 meet with the customer, try to understand
 4 their load, what their demands are going to
 5 look like, their connected capacity, you
 6 know, what their scheduling is in terms of
 7 requiring the new load to be construction
 8 power or not, when you're going to need full
 9 power, and then that technologist would
 10 complete typically a design to connect that
 11 customer to the electricity system. If
 12 there are upstream impacts, so you know, so
 13 far we've been talking about the site, you
 14 know, but if there are upstream impacts, you
 15 know, our engineering team, our planning
 16 team would look at that to understand okay,
 17 is this going to exceed the capacity of the
 18 line further up or, you know, have impacts
 19 on the substation or transmission network.
 20 We're getting into very large loads here
 21 now. And they would engage our engineering
 22 team, if necessary. You know, in terms of
 23 completing the design, I mean, we're looking
 24 for the least cost approach to connect that
 25 customer to the grid. So, what is the

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1 nearest, straightest route that we can get
 2 that customer connected, and you know, if
 3 we're getting into – in terms of connect the
 4 customers, you're looking at then getting
 5 into the CIC policy, right. And so, then if
 6 we have the design, we would understand what
 7 the costs are to connect that customer to
 8 the grid and in understanding the customer's
 9 load and demand and we're likely looking at
 10 other similar customers as well to help
 11 understand that, and we determine what their
 12 revenue would be from those customers going
 13 forward and, you know, that's where the CIAC
 14 policy kicks in, right, if it's a service
 15 that large. So, that would be reviewed and
 16 if necessary, file with the Board and
 17 approved with the Board if there's CIC
 18 required, and that generally is how the
 19 process works.
 20 FITZGERALD, KC:
 21 Q. Okay. Thanks for that. The connection
 22 policy itself, is that in a document that's
 23 in evidence or is that internal to your
 24 department?
 25 MR. CHUBBS:

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1 A. The CIC policy, I'm fairly certain it's a
 2 publicly available document. I'm not sure
 3 that it's on the record.
 4 FITZGERALD, KC:
 5 Q. Okay. So that it's one and the same. Your
 6 connection policy is the CIAC?
 7 MR. CHUBBS:
 8 A. Yes, that's what we're into, yes.
 9 FITZGERALD, KC:
 10 Q. They're identical?
 11 MR. CHUBBS:
 12 A. Contribution in aid of construction, CIAC.
 13 Sorry, didn't clarify that. I should also
 14 add that that's something that's routinely
 15 reviewed and updated based on updated costs
 16 as well. So, we see cost for poles or
 17 conductor, things like that, to change over
 18 time. That is updated routinely.
 19 MR. O'BRIEN:
 20 Q. Mr. Fitzgerald, I think it is on the record
 21 in response to one of your – I think it's
 22 CA-NP-134.
 23 FITZGERALD, KC:
 24 Q. Sure. I just wanted to confirm that we're
 25 talking about the same thing, the connection

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1 policy that Mr. -
 2 MR. O'BRIEN:
 3 Q. That's fair.
 4 FITZGERALD, KC:
 5 Q. - Chubbs just went through reflects – And I
 6 guess, while we're on the MUN issue, if we
 7 can go to CA-NP-255, Attachment A, please?
 8 Thank you. And if we scroll down a little
 9 bit further. Okay. Here we have the – and
 10 I don't know if we can capture the whole
 11 page, top of the page. Okay, you almost had
 12 it there. Okay. So, this confirms -- this
 13 is supplying feeder or transmission line.
 14 Then we have, to the left, that column,
 15 left-hand column, supplying substation and
 16 then it has MUN LPD, feeder code not
 17 applicable, designation 1-12L, 14L, 36L,
 18 voltage 66. Feeder capacity, supplying
 19 transmission, and the far right-hand column,
 20 customer served by substation one. So,
 21 that's confirmed?
 22 MR. CHUBBS:
 23 A. Yes, that's confirmed.
 24 FITZGERALD, KC:
 25 Q. If we just go to page 32 and 33 of the

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1 rebuttal evidence, down at line 19. You're
 2 on the right page?
 3 MS. GLYNN:
 4 Q. I think it was page 32.
 5 FITZGERALD, KC:
 6 Q. 32, I'm sorry, line 19. And I think we've
 7 been through this a little bit already, Mr.
 8 Chubbs, but the rebuttal evidence says, "Mr.
 9 Bowman does not acknowledge that a
 10 contribution was not required from MUN since
 11 the cost of supplying the university,
 12 including the cost associated with assets
 13 that only benefit MUN, are recovered through
 14 rates". And so, are all the costs going to
 15 be recovered through rates?
 16 MR. CHUBBS:
 17 A. I think it's best for Mr. Comerford to get
 18 into the details on which costs hit rates
 19 and which don't. As I mentioned, you know,
 20 there's – we've got multiple things going on
 21 there at Memorial University. You know, the
 22 redundant facility, which was fully
 23 contributed by Memorial, is there. So, that
 24 wouldn't impact rates. Then you have the
 25 expansion of Long Pond substation for the

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1 addition of the boilers. There was no
 2 requirement for an upfront contribution
 3 because the cost of that will be recovered
 4 from rates and you know, the expansion or
 5 the replacement of the failed MUN T-2
 6 transformer, you know, is a unit that was
 7 serving the university that failed and needs
 8 to be replaced and that would be recovered
 9 through rates collected from that general
 10 service category. So, as I said, there's a
 11 few things happening there, and Mr.
 12 Comerford certainly can speak to the details
 13 on it.
 14 FITZGERALD, KC:
 15 Q. Okay. Well, we'll defer it to Mr.
 16 Comerford. If we can go for a second to
 17 PUB-NP-105? Here the question was: "was the
 18 reasonableness of the rate paid by MUN
 19 evaluated in the previous rate design
 20 reviewed? If yes, what was the conclusion?"
 21 The answer is: "yes, Newfoundland Power's
 22 current customer rate reflects – rates
 23 reflect the recommendations of the retail
 24 rate review conducted in 2010." So, that's
 25 14 years ago. How can we be confident that

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1 the cost of supply to MUN is recovered in
 2 rates when there hasn't been an assessment
 3 in 14 years?
 4 (10:30 a.m.)
 5 MR. CHUBBS:
 6 A. So, I think what we're pointing out here
 7 really is that we've got some big changes
 8 happening at Memorial University now that
 9 are currently ongoing. The fact that MUN is
 10 adding boilers, expanding the substation,
 11 you know, the revenue from Memorial
 12 University will change significantly in the
 13 next year or so when that project comes
 14 online, and that will be the appropriate
 15 time to look at MUN and MUN's rate and
 16 whether we need to do something differently.
 17 The last time this was reviewed in 2010, you
 18 know, we're looking at the cost to service
 19 MUN compared to that rate 2.4 category and
 20 we're looking at the revenue we collect
 21 through that from rate 2.4 customers and the
 22 revenue we collect from Memorial University
 23 and they were generally in line, you know.
 24 And at that time, it was deemed appropriate
 25 that Memorial University continue to be a

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1 rate 2.4 customer. I think with the
 2 upcoming changes, MUN expanding, you know,
 3 there's potential there that they could
 4 become a curtailable customer. So, we need
 5 to consider that as well going forward.
 6 That is something that we want to review and
 7 the appropriate time is to do that review
 8 prior to our next general rate application
 9 when we have certainty on all this.
 10 FITZGERALD, KC:
 11 Q. Sure. And you mentioned that there's a lot
 12 of changes coming and it's growing. Is MUN
 13 going to come to the point that they're
 14 actually a distributor of electricity?
 15 MR. CHUBBS:
 16 A. I'm not sure I could speculate on that. I
 17 mean, you know, Memorial University has been
 18 a customer of Newfoundland Power for
 19 decades, right. I think that the
 20 arrangement works well. I think that – I
 21 can't necessarily see how Memorial
 22 University would become a distributor and
 23 what the benefit would be there at this
 24 point.
 25 FITZGERALD, KC:

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1 Q. I guess they have multiple physical plants.
 2 Health Science Centre for one, I believe.
 3 Would you agree? I think that's one of
 4 their – not say their customers, but one of
 5 the physical plants to which they provide
 6 electricity?
 7 MR. CHUBBS:
 8 A. Yeah, I mean, all – you know, you got the
 9 full campus, right, that's being supplied
 10 from MUN substation and Long Pond
 11 substation, you know, as a customer of
 12 Newfoundland Power in rate 2.4 category.
 13 So, it's been that way for a long time.
 14 Again, they've been that way for decades.
 15 We looked at it in 2010. They still fit
 16 that rate 2.4 category in terms of the
 17 revenues we collect from Memorial University
 18 and the cost that we incur to serve them.
 19 So, continue to be appropriate. Right now,
 20 it's something we'll look at again, whether
 21 we need to separate them out into a class of
 22 their own potentially, you know, that has a
 23 different rate. But that's something to be
 24 determined once we fully understand the
 25 changes in their demand, energy consumption.

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1 Again, whether they could potentially be a
 2 curtailable customer for us. So, all that
 3 kind of needs to be factored in before we
 4 would pull that out. I don't necessarily
 5 see, you know, getting into distribution at
 6 the university, how that kind of makes
 7 sense.
 8 FITZGERALD, KC:
 9 Q. Well, I'm just--you know, when you think it
 10 through, I suppose, if MUN has its own
 11 substation, there's one customer, they're
 12 distributing power. For example, they
 13 distribute power again to the Health Science
 14 Centre. If there was a failure in supply,
 15 whose responsibility is it? Is it MUN's, or
 16 is Newfoundland Power's?
 17 MR. CHUBBS:
 18 A. MUN currently owns the distribution within
 19 the campus, right.
 20 FITZGERALD, KC:
 21 Q. Right.
 22 MR. CHUBBS:
 23 A. So, our service point leads up to the
 24 substation. So, any failure of a
 25 distribution cable, or a piece of equipment,

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1 or a switch within their facility, are their
 2 responsibilities, not the responsibility of
 3 Newfoundland Power.
 4 FITZGERALD, KC:
 5 Q. Well, it's almost to the point that, you
 6 know, of that size, you know, should the
 7 Public Utilities Board regulate their
 8 distribution of power to, for example, the
 9 Health Science Centre or other physical
 10 plants on the campus. You have no
 11 responsibility beyond their distribution
 12 point, then obviously, or not obviously, but
 13 I would think that there would be no legal
 14 liability either, but then that's the Wild
 15 West. There is a distributor there
 16 contributing, or distributing, electricity
 17 with no regulation.
 18 MR. CHUBBS:
 19 A. We have many commercial customers. We serve
 20 them up to the point of, you know, the
 21 metering of that facility. They have
 22 buildings that are distributing electricity
 23 throughout different floors, or maybe even
 24 different buildings, on the same site. So,
 25

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1 that would be a routine scenario. These
 2 costs aren't incurred by Newfoundland
 3 Power's customers. They're not passed on to
 4 Newfoundland Power's customers. So, what's
 5 on the other side of that meter really
 6 doesn't impact rates for Newfoundland
 7 Power's customers, or rates in this
 8 Province, that I can see. So, I don't quite
 9 understand why the regulator would need to
 10 step in there and regulate the University.
 11 You know, I'm not really following where
 12 you're going with it, but -
 13 FITZGERALD, KC:
 14 Q. Sure. Well, if that's your answer. Let's
 15 move on to another topic, page 40 of the
 16 rebuttal evidence. So, at the bottom of the
 17 page there it says, "Since the frequency of
 18 Newfoundland Power's customer outages is
 19 consistent with the Canadian average, Mr.
 20 Bowman's recommendation implies that the
 21 company should slow its response to customer
 22 outages." Mr. Bowman didn't actually say
 23 that, would you agree?
 24 MR. CHUBBS:
 25

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1 A. I'll take your word on it that it's not in
 2 his evidence.
 3 FITZGERALD, KC:
 4 Q. Okay. If I could characterize his evidence,
 5 and if you don't accept you'll tell me, but
 6 isn't Mr. Bowman saying that Newfoundland
 7 Power should stop spending money to target a
 8 safety level that is 40 percent better than
 9 the Canadian average when it doesn't have
 10 the evidence that the customers are willing
 11 to pay for safety levels that are 40 percent
 12 better than Canadian average? That's his
 13 point, would you agree?
 14 MR. CHUBBS:
 15 A. I guess.
 16 FITZGERALD, KC:
 17 Q. On page 41, line 1, the statement here is,
 18 "Newfoundland Power does not seek overall
 19 reliability and service improvements, nor is
 20 its capital spending driven by overall
 21 reliability improvements." And then further
 22 it says, "Newfoundland Power's capital
 23 planning process"--I'm at line 6 here now,
 24 "Is a deliberate effort to balance the cost
 25

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1 and liability of service provided to
 2 customers." So, can you maybe expand on
 3 that, explain how Newfoundland Power's
 4 capital spending is not driven by overall
 5 reliability improvements, at the same time
 6 your capital planning process is a
 7 deliberate effort to balance the cost and
 8 reliability of service provided to
 9 customers?
 10 MR. CHUBBS:
 11 A. The way Newfoundland Power looks at it, and
 12 our experience in terms of cost and
 13 reliability, is that a reliable system is an
 14 efficient system. When you look at
 15 Newfoundland Power's experience over the
 16 last 20 years, our reliability 20 years ago
 17 was worse than it is today, you know, twice
 18 as--customers experience outages twice as
 19 much as they do today.
 20 Over that 20 years we've deliberately
 21 focused, I'll say the first half of that 20
 22 years, we focused on improving reliable
 23 service to customers. We brought in a
 24 preventative maintenance program, integrated
 25

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1 that into our generation substation
 2 transmission and distribution processes
 3 through inspections and repairing things as
 4 they approached end of life, and we reached
 5 a level where we were comfortable that we
 6 were doing the right things in terms of
 7 overall reliability. You know, our concern
 8 with the implication, or the--I should say
 9 the recommendation that we target
 10 reliability that's worse. We don't see,
 11 based on our experience, how that reduces
 12 cost.
 13 So, when we look at how we achieve the
 14 reliability that we've experienced today, I
 15 mentioned this in my direct, it breaks down
 16 into three areas, right. It's the standards
 17 that we build the electricity system to, and
 18 it is the maintenance practices that we have
 19 in place to maintain the system, and then
 20 it's our operational response, how quick we
 21 actually respond when things fail.
 22 So, when there's a suggestion that we
 23 need to reduce reliability to our customers,
 24 when you practically think about how am I
 25

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1 going to accomplish that--well, if we go to
 2 number one, you know, you're suggesting that
 3 we build to a lower standard, right. We
 4 build to national standards that
 5 specifically are designed to account for the
 6 weather, severe weather that we have in
 7 Newfoundland and Labrador. So, we're
 8 suggesting now we build something--to
 9 something that's a lower standard that's
 10 going to fail when we have these severe
 11 weather conditions, and then you have to
 12 rebuild. So, yeah, could you build it more
 13 cheaply upfront by building a substandard
 14 line? You could do that, but it's going to
 15 fail and you're going to build it again.
 16 It's not going to save any cost. And the
 17 suggestion is at this time, when we're
 18 thinking about looking forward and climate
 19 change impacts, impacts on the grid, we're
 20 wondering if we're building strong enough,
 21 you know. And CSA, the Canadian Standards
 22 Association are looking at that, you know,
 23 our utilities and are our standards
 24 sufficient to meet future storms, right, and
 25

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1 that's something that we're all--all
 2 utilities are trying to understand. So, I
 3 don't see how that reduces cost. I don't
 4 see, you know, how I could even propose
 5 building a substandard line anyway.
 6 So, then we go to number two, which is
 7 how we maintain the system. And we maintain
 8 the system in a manner that gets the maximum
 9 life out of our assets. We inspect our
 10 distribution lines, our transmission lines,
 11 our substations, on a routine basis. We
 12 come back on a regular cycle. We look at
 13 the assets and we say is that going to last
 14 another year, or is this something that I
 15 need to replace within the next year or so.
 16 So, if we're talking about trying to
 17 reduce cost by doing less maintenance--so,
 18 you know, the way you accomplish that is
 19 well, I can stop inspecting lines, and I
 20 guess I could save some money by not having
 21 people out looking at our substations and
 22 our lines.
 23 You know, let's put safety aside there
 24 for a second, let's say we do that, but
 25

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1 things are still going to fail, right.
 2 They're going to fail, but they're going to
 3 fail in an unplanned fashion, right.
 4 They're going to fail in a storm. They're
 5 going to fail in the middle of the night.
 6 You're going to be getting crews out of bed
 7 to respond. You're going to be paying them
 8 double time to respond. So, it's only going
 9 to drive costs up.
 10 The way we do it today is we inspect
 11 our lines, we manage our assets, we try to
 12 determine when that piece of equipment is
 13 going to fail, and we try to replace it as
 14 close to before that point as we can
 15 practically speaking, right, in a planned
 16 fashion. So, you're doing it on a regular
 17 time, minimizing the impact on customers,
 18 and at the lowest possible cost.
 19 So, then getting to the recommendation
 20 of, well, how do I reduce my reliability 40
 21 percent. Then you get to the third piece,
 22 which is your response time. So, I guess if
 23 we want to reduce reliability to customers,
 24 well, when they call in and say my power is
 25

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1 out, I guess we can, you know, wait an hour
 2 and then send a crew, and that will reduce
 3 our average duration of outages. I don't
 4 see how that saves costs. It certainly--
 5 it's certainly not good customer service,
 6 but I don't see how that reduces cost to any
 7 great degree.
 8 So, when I see the recommendation of,
 9 you know, targeting worse reliability
 10 performance than we currently experience
 11 today, I see only cost pressure, increase
 12 costs, or reduce service to customers, both
 13 really. So, we have--you know, we have a
 14 hard time getting to that point, you know.
 15 We think what we do today in terms of
 16 managing our electricity system is
 17 appropriate, it's reasonable. It's
 18 providing good outcomes to customers, and at
 19 the end of the day it least cost, right. If
 20 you're managing that asset to the--as close
 21 as you can to before it fails, that is the
 22 least cost way to manage the electricity
 23 system.
 24 (10:45 a.m.)
 25

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1 FITZGERALD, KC:
 2 Q. Okay. Thanks for that full answer. I guess
 3 the--we're maybe talking semantics here as
 4 about targeting less reliability as opposed
 5 to, you know, maintaining this 40 percent
 6 better than Canadian average spot where we
 7 find ourselves now after we've paid for
 8 this. So, on page 41 it's stated that, if I
 9 can take you there for a second, at line 12
 10 it says, "Newfoundland Power employees that
 11 are responsible for responding to customer
 12 outages are also responsible for maintaining
 13 the integrity of the electrical system."
 14 So, if the Board ordered Newfoundland Power
 15 to reduce the cost of its operating budget,
 16 would there be an impact on saving?
 17 MR. CHUBBS:
 18 A. Well, it would depend on what cost you're
 19 talking about. I mean, if you're talking
 20 about reducing cost that we incurred to
 21 inspect our distribution lines, or
 22 transmission lines, it absolutely would
 23 affect saving. If you're talking about not
 24 responding to equipment that's failed in the
 25

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1 field, I mean, absolutely that would affect
 2 our saving.
 3 FITZGERALD, KC:
 4 Q. Well, you know, just operating costs, and
 5 not particularly your department but, you
 6 know, if it was asked--the Board ordered
 7 Newfoundland Power to reduce the cost of its
 8 operating budget generally, I mean, is there
 9 going to be a reduction in saving?
 10 MR. CHUBBS:
 11 A. Again, we're hypothetical here. I would
 12 assume there would be some direction or
 13 understanding from the Board on where they
 14 felt our costs weren't appropriate. You
 15 know, if we're getting into--we've talked
 16 about the operational cost. If you're
 17 getting into customer service costs--so, are
 18 we talking about, you know, not answering
 19 the phones when customers call in, like
 20 having reduced staff at our contact centre
 21 so customers can't reach us, or not having
 22 the technologies that they can't report
 23 outages, you know, appropriately, or not
 24 having technology so customers can see that
 25

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1 they're being impacted by an outage or when
 2 the restoration time is? I mean, all of
 3 these costs, you know, are related to the
 4 reliability and the service that we provide
 5 to our customers.
 6 FITZGERALD, KC:
 7 Q. So, would you agree that there is an
 8 incremental cost associated with maintaining
 9 current levels of reliability?
 10 MR. CHUBBS:
 11 A. In our, Newfoundland Power's, view the
 12 reliability of the service we provide to our
 13 customers is least cost. That's the way we
 14 look at it. Our experience has been over
 15 the last two decades that we've been able to
 16 improve reliability that we provide to our
 17 customers, while at the same time managing
 18 our operating cost and keeping them below
 19 inflationary levels. So, in our view, a
 20 reliable system is an efficient system.
 21 Now, that's not--that doesn't go on forever,
 22 right. You can't just keep adding and
 23 improving reliability and cost goes down to
 24 nothing.
 25

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1 We all understand that if we wanted to
 2 really improve reliability, and this is kind
 3 of where we feel we are now--if we're
 4 looking for continual improvements on
 5 reliability, you're probably adding cost,
 6 right. You're probably--we're talking about
 7 putting your system underground, or having
 8 two feeders every--you know, two feeders
 9 everywhere, redundant equipment everywhere.
 10 We're not--certainly not there.
 11 We feel like the point where we are
 12 right now provides reasonable reliability to
 13 our customers, and our customer satisfaction
 14 scores tell us that they feel that the
 15 reliability received is appropriate, and we
 16 feel that the least cost. We feel our
 17 approach to managing the reliability of the
 18 electricity system is least cost for our
 19 customers.
 20 FITZGERALD, KC:
 21 Q. There's a comment made here if we can go to
 22 page 43 in the rebuttal evidence, and it's
 23 again critical of Mr. Bowman's evidence, and
 24 I would suggest perhaps mischaracterizing
 25

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1 what he is saying, but at page 5, or line 5,
 2 I'm sorry, it says, "Intentionally allowing
 3 system reliability to degrade." So, this
 4 gets back to your comment about ethics, and
 5 you couldn't do that in good conscientious,
 6 certain things, you know, but the intention-
 7 -it's kind of a strong word there. If the
 8 Board were to order Newfoundland Power to
 9 reduce spending on operating costs, you
 10 know, wouldn't the reduction of spending on
 11 operating costs, you know, simply--it's not
 12 a degrading of the reliability, it's just a
 13 signal, or an indication, or incentive, for
 14 Newfoundland Power to become more efficient
 15 with what they have to spend on reliability?
 16 MR. CHUBBS:
 17 A. You know, throughout our evidence there's
 18 many examples of how Newfoundland Power has
 19 improved its overall operating efficiency.
 20 We've done that through maintaining the
 21 system reliably. We've done that through
 22 the use of technology to allow us to operate
 23 more efficiently. You know, what we're
 24 getting at here when we're talking targeting
 25

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1 worse reliability, we're getting into areas
 2 in that in our view would increase cost,
 3 right. It would result in more unplanned
 4 failures to our customers, and again, more
 5 occasions where our crews have to respond
 6 after hours, overnight, in the middle of
 7 storms, to things that fail rather than
 8 responding in a planned fashion, right, in a
 9 least cost manner.
 10 So, you know, it's difficult to see how
 11 cutting operating cost, or cutting
 12 investment in the system to maintain
 13 reliability, leads to lower cost at the end
 14 of the day. I just can't see it in terms of
 15 how we operate our electricity system. We
 16 feel it's providing good value to our
 17 customers. We feel that, you know, that's
 18 indicated from our customers, from our
 19 customer surveys, and overall the costs
 20 we've put forward are reasonable and they're
 21 appropriate.
 22 FITZGERALD, KC:
 23 Q. But we're talking maybe of two different
 24 things. You know, what I'm suggesting is
 25

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1 the 40 percent above average reliability
 2 that Newfoundland Power enjoys, or perhaps
 3 you might argue that the customers enjoy,
 4 you're suggesting that if that was degraded,
 5 and that's your word, or if that--you know,
 6 if that was to not be at that level, say 20
 7 percent, or even down to five percent of
 8 higher than the Canadian average, then this
 9 would cost, this would not be least cost.
 10 There would be cost affects of that. But
 11 your--do you have any, you know, empirical
 12 evidence, you know, regarding your peers'
 13 experience, other utilities who aren't
 14 enjoying 40 percent reliability? Are they
 15 somehow being irresponsible and costing
 16 their customers money by keeping reliability
 17 at an average as opposed to an over average
 18 amount?
 19 MR. CHUBBS:
 20 A. Well, I mean, it's important to keep in mind
 21 that when we talk about the Canadian
 22 average, you know, this is the Electricity
 23 Canada region 2 utilities, so utilities with
 24 an urban/rural mix, which is what
 25

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1 Newfoundland Power has. There's 16 or 18
 2 utilities in that. The last time I looked
 3 at it half were above or so, half were
 4 below. Not every utility is experiencing
 5 the same number and Newfoundland Power's
 6 here. There's a range of experiences in
 7 there, and it's related to a lot of things,
 8 right. It's related to the condition of
 9 their electricity systems and how they
 10 maintain them, all that's part of it. You
 11 know, it's related to the environmental
 12 conditions that they're under, different
 13 jurisdictions.
 14 So, there's a lot of factors that are
 15 at play in that Canadian average number.
 16 So, because we're 40 better we're not
 17 outlier certainly. We don't see it
 18 necessarily as a--that's our position among
 19 the group.
 20 Even the urban/rural mix, for example,
 21 you know, some utilities, you know, you tip
 22 in and get better reliability in urban areas
 23 where you can respond a little quicker
 24 versus rural areas, right. So, all those
 25

<p style="text-align: right;">Page 101</p> <p>1 can--so, it's really hard to sit back and 2 look at utility by utility, where they are 3 in terms of overall cost and overall 4 reliability. 5 Again, the way we view it is we are 6 building our system to the appropriate 7 standards they should be built to. We're 8 maintaining the system, you know, using 9 utility best practice. This was reviewed by 10 Liberty on behalf of the Board. It 11 determined that our maintenance practices 12 were appropriate, and then we respond 13 effectively. And I think another thing to 14 point out, and it's very important to point 15 out, is the reliability number we're talking 16 about, which is SAIDI, right, your average 17 duration of customer outages. There's two 18 parts that make that up, right. It is how 19 frequent a customer experiences an outage, 20 and then how long that outage, that average 21 outage, occurs, right. 22 So, last year, for example, our 23 reliability under normal operating 24 conditions was 2.6 hours. That's what our 25</p>	<p style="text-align: right;">Page 103</p> <p>1 we're talking response. And, you know, for 2 me largely it's cultural, right. Our 3 employees, when the power is out, they 4 respond, right, that's what they do. And 5 it's been, you know, engrained in the 6 culture at Newfoundland Power, certainly for 7 my entire career, that when the power is out 8 the customer--our crews go. They get up and 9 go and they respond, and they respond very 10 effectively, and the folks who are managing 11 that response, specifically like for the 12 large storms, do a really good job managing 13 that response. 14 And over time as well, another 15 component of that is the technology we've 16 put around the management of that response 17 time. We've added over the decade or so 18 technologies, you know, our geographical 19 information system, which gives us the 20 location of our assets and our crews, you 21 know, on the screen for our dispatchers and 22 our control centre to get, you know, the 23 nearest crew to the outages as quick as 24 possible so they know exactly where their 25</p>
<p style="text-align: right;">Page 102</p> <p>1 average customer with Newfoundland Power 2 experienced, was 2.6 hours of outage time. 3 That's excluding major storms and any loss 4 of supply. When you break that down, the 5 average customer of Newfoundland Power last 6 year experienced two outages, and the 7 average outage lasted 1.3 hours, right. So, 8 two outages times 1.3 hours gives you 2.6 9 hours of total outage. 10 When we compare the frequency, so that 11 two outages that each customer experienced, 12 to the Canadian average, our frequency of 13 outages is actually right in line with 14 Canadian average. So, that tells me our 15 system is holding up as well as the average 16 utility in Canada, right. The difference 17 for Newfoundland Power is the duration of 18 each outage, right, so that 1.3 hours on 19 average that an outage lasts, and that's the 20 operational response piece, right. 21 And there's a couple of things you can 22 attribute that to. Why is Newfoundland 23 Power 40 percent better in that category, 24 right? So, we're not talking the system, 25</p>	<p style="text-align: right;">Page 104</p> <p>1 crews are. 2 We've built in--we got a new Edge 3 Management system that we've added in the 4 last five years that predicts the location 5 of outages. So, when we get calls from 6 customers it--you know, as those calls are 7 coming in, our Edge Management system, which 8 understands the connectivity of the 9 electricity system, and it says, well, I'm 10 getting three or four calls over here. It 11 looks like this neighbourhood is out, or 12 this transformer is out. I'm getting more 13 calls over here. Okay, no, that looks more 14 like this tap, this line, is out, or this 15 neighbourhood is out, and it predicts where 16 the trouble is rather than just having a 17 list of outage reports from customers. 18 So, that allows us to understand what 19 the impact is on the grid, and it also 20 allows us to predict which other customers 21 are impacted by having reported the outage. 22 So, now when they call in our technology in 23 our contact centre, when it picks up, it 24 right away knows that you are being affected 25</p>

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1 by an outage right now, right, and we can
 2 tell that customer--you know, they can go
 3 through our interactive voice recording
 4 system and all that, and we can say we're
 5 aware of your outage. So, they don't need
 6 to talk to a contact centre agent, right, as
 7 well. So, we've put a lot of technology
 8 around our operational response, and that is
 9 the differentiator for Newfoundland Power,
 10 not the system necessarily.
 11 (11:00 a.m.)
 12 FITZGERALD, KC:
 13 Q. Okay. I don't mean to cut you off there,
 14 but I guess the question is, and I
 15 understand what you've just said, but you
 16 would have us believe that by maintaining a
 17 40 percent safety above Canadian average
 18 that is actually saving consumers money.
 19 Even though there's a capital cost involved
 20 there, and a huge labour cost as you--I
 21 think you sort of indicated, that somehow
 22 this 40 percent is actually saving us money.
 23 Is that what you're suggesting?
 24 MR. CHUBBS:
 25

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1 A. I can understand what you're getting at,
 2 right. There is a cost to maintaining the
 3 electricity system, and I agree with you
 4 there. I think where the disconnect is is
 5 that in our view this is the least cost way
 6 to go about it. If you're building your
 7 line to the standard it needs to be built
 8 to, and you're maintaining the system to get
 9 the maximum life out of that asset, right,
 10 so that you replace it in a planned fashion
 11 on regular time, and not allow it to fail so
 12 that you're replacing it on overtime, after
 13 hours, calling crews out of bed, you know,
 14 to go do that, then that is the least cost
 15 way to go about maintaining the system,
 16 right. So -
 17 FITZGERALD, KC:
 18 Q. Okay. Sorry, I don't mean to cut you off
 19 again but we're getting close to the break.
 20 I have one more question on this topic if I
 21 might. You did mention that you believe
 22 that this is also--this 40 percent above
 23 average safety rate is aligned with what
 24 customer surveys have communicated to
 25

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1 Newfoundland Power, but we do know, or
 2 correct me if I'm wrong, that no customer of
 3 Newfoundland Power has ever been asked if
 4 they would--if they would be okay with a
 5 lesser response time for an outage if in
 6 fact that reflected in a lower power bill.
 7 You mentioned earlier about the culture of
 8 Newfoundland response, or employees'
 9 response. We know, of course, they're not
 10 volunteering this, this is all overtime
 11 work. So, it is a cost to actually, you
 12 know, get the line back up immediately, but
 13 we do know that it's never been--we
 14 understand that the surveys are geared
 15 toward asking are people satisfied with
 16 Newfoundland Power's service, and it's a
 17 scale and they say yes or no, but they've
 18 never been asked whether in fact they would
 19 be okay with a lesser duration, or a longer
 20 duration, outage if it would save them
 21 money. We know that question has never been
 22 asked, correct?
 23 MR. CHUBBS:
 24 A. I just want to correct what you mentioned
 25

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1 there about it's all overtime, right. I
 2 mean -
 3 FITZGERALD, KC:
 4 Q. Sorry, okay.
 5 MR. CHUBBS:
 6 A. I mean, our approach is to minimize the
 7 amount of overtime that is involved in
 8 responding to customer outages, right. In
 9 terms of the survey--I mean, this has been
 10 asked many times, and it's been asked as
 11 part of our capital budget, and it's been
 12 asked here as well. You know, the premise
 13 of the survey, and I think this is what I
 14 started with, I think is where the--that the
 15 question that you're asking is where the
 16 problem is, right. This idea that it's a
 17 trade off that we can turn the dial on
 18 reliability down to save cost, and I walked
 19 through earlier--you know, when you think
 20 practically about how you actually reduce
 21 reliability for customers, it looks like
 22 increase cost, you know. It looks like
 23 again building substandard lines, or not
 24 maintaining your lines, and in responding
 25

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1 inefficient, unplanned, fashion at higher
 2 cost. So, I think that, you know, to go and
 3 ask customers would you like to experience
 4 less, a less reliable service at a lower
 5 cost is a false premise, right, because I'm
 6 not sure that that's something that
 7 Newfoundland Power could deliver on. We
 8 feel that we're providing an appropriate
 9 level of reliability for our customers, and
 10 that is least cost. That's our view.
 11 FITZGERALD, KC:
 12 Q. Thanks, Mr. Chubbs. I think you and I are
 13 testing the patience of the Board here now,
 14 so I guess we should probably break.
 15 CHAIR:
 16 Q. Thank you. We'll recess.
 17 (BREAK – 11:04 a.m.)
 18 (RESUME – 11:36 a.m.)
 19 CHAIR:
 20 Q. Thank you, Mr. Fitzgerald.
 21 FITZGERALD, KC:
 22 Q. Thank you, Mr. Chairman. Just to change the
 23 topics really quickly, Mr. Chubbs, on the
 24 issue of operating costs and executive
 25

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1 compensation, if we could go to the Korn
 2 Ferry report, please, at page 9. And, Mr.
 3 Chubbs, your salary is demonstrated there
 4 for all to see. Your base salary is there
 5 at \$345,000.00 and there's a target of
 6 65750, and the total target remuneration is
 7 712. Are you able to tell us what portion
 8 of that, assuming that you make that, what
 9 portion on a percentage basis is paid by the
 10 consumer?
 11 MR. CHUBBS:
 12 A. The way our compensation works, so my base
 13 salary of 345 would be included in regulated
 14 costs. We have a short-term and a long-term
 15 incentive which is included in the total
 16 here, but only the short-term incentive up
 17 to 100 percent of that amount is included in
 18 regulated costs. Anything above 100 percent
 19 on the short-term incentive is non-regulated
 20 and the long-term component of it is also
 21 non-reg—it's not incurred by customers.
 22 FITZGERALD, KC:
 23 Q. Okay, so it's not obvious to me, then, if I
 24 look at the 712 figure of the annual salary,
 25 let's assume that that target is met, are

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1 you able to sort of tell me or the Board, I
 2 guess, you know, what portion of that would
 3 you expect, rather than, you know, STIs in
 4 the long-term, reasonably what would you
 5 expect of that 712 would be non-regulated?
 6 MR. CHUBBS:
 7 A. Non-regulated?
 8 FITZGERALD, KC:
 9 Q. Non-regulated. Well it doesn't matter, I
 10 mean whichever way you answer it.
 11 MR. CHUBBS:
 12 A. Yeah, I mean a rough calculation probably
 13 500 would be regulated, the other 200 would
 14 be non-regulated.
 15 FITZGERALD, KC:
 16 Q. Okay, thank you. And just going back this
 17 morning, your testimony regarding the load
 18 research study and the ordering of the
 19 meters that are on backorder, I understand
 20 those are probably smart meters, is that
 21 correct, is that what we're waiting for?
 22 MR. CHUBBS:
 23 A. Yes, those meters would be capable, smart
 24 meters are providing that 15 minute interval
 25 data, so our reading on the customer's

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1 premise every 15 minutes to give you that
 2 granularity of data that you would need for
 3 a load research study.
 4 FITZGERALD, KC:
 5 Q. Okay, and did you say, I know you deferred
 6 some questions to Mr. Comerford, but would
 7 he know when it was that following the
 8 agreement on the load research study, would
 9 he know when it was that, when these meters
 10 were ordered by Newfoundland Power?
 11 MR. CHUBBS:
 12 A. Yes, Mr. Comerford certainly could speak to
 13 how that load research study has kind of
 14 unfolded in terms of all aspect of, you
 15 know, seeking, I'll say developing a
 16 framework, seeking the appropriate partners
 17 and consultants who can complete that work
 18 for us, determine the number and the type of
 19 meters that we would have needed and then,
 20 of course, when the meters were ordered and
 21 when we understood what the delivery times
 22 would be, he can give you the full details
 23 on that.
 24 FITZGERALD, KC:
 25 Q. Okay. In the meantime, it's your

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1 department, can I ask for an undertaking
 2 that you provide to us the date that the
 3 smart meters were ordered?
 4 MR. CHUBBS:
 5 A. Okay, yes.
 6 MS. GLYNN:
 7 Q. That would be Undertaking No. 8.
 8 FITZGERALD, KC:
 9 Q. Just on the issue of smart meters, Mr.
 10 Bowman, in his evidence, has put forward
 11 some statistics regarding smart meters and
 12 I'm just going to ask you about them,
 13 whether you agree or disagree. One of the
 14 statements that he has made is that over 70
 15 percent of Canadian households and
 16 businesses currently use smart meters, would
 17 you agree or disagree?
 18 MR. CHUBBS:
 19 A. I haven't looked into the numbers myself, I
 20 would tend to agree that the majority of
 21 meters out there are smart meters.
 22 FITZGERALD, KC:
 23 Q. Okay, there's another statistic that was
 24 mentioned in Mr. Bowman's evidence about a
 25 forecast that 94 percent of Canadian

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1 households and businesses will have smart
 2 meters by 2027. Would you take issue with
 3 that projection?
 4 MR. CHUBBS:
 5 A. No, I would not.
 6 FITZGERALD, KC:
 7 Q. Okay, and also we have an RFI and I don't
 8 know if we have to go there, just ask you
 9 the question, but the reference is CA-NP-
 10 034, footnote No. 5. And the quote is—and I
 11 guess we could go there, I suppose, to be
 12 fair, CA-NP-034, footnote 5. It says here,
 13 "In Canada"—maybe we should scroll up to the
 14 reference of the footnote, right so now down
 15 to the footnote it says, "AMI technology has
 16 been mandated by legislation in British
 17 Columbia and Ontario." You agree?
 18 MR. CHUBBS:
 19 A. Yes, I would agree.
 20 FITZGERALD, KC:
 21 Q. And in footnote No. 7 on the same RFI there
 22 is a statement that "Nova Scotia Power
 23 received approval for an 133 million smart
 24 meter project", so you would agree with
 25 that?

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1 MR. CHUBBS:
 2 A. Yes, I would agree with that.
 3 FITZGERALD, KC:
 4 Q. And further "New Brunswick Power received
 5 approval for 110 million dollar smart meter
 6 project before the Federal New Brunswick
 7 Energy and Utilities Board", do you agree?
 8 MR. CHUBBS:
 9 A. Yes, I agree.
 10 FITZGERALD, KC:
 11 Q. And at paragraph C of the same RFI, line 4
 12 of this page, if you could scroll down and
 13 this is Newfoundland Power saying, "The
 14 benefits of AMI technology can include the
 15 ability of remotely read meters, automatic
 16 outage detection and management, the ability
 17 to remotely connect or disconnect service to
 18 customers, monitoring power quality and
 19 implementation of the many responsive
 20 programs, such as Time-Of-Use rates,
 21 enablement of distributed energy generation,
 22 the ability to provide customers
 23 personalized energy saving tips and
 24 recommendations." So that is the
 25 information that we have, those are the

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1 advantages of smart meters, correct?
 2 MR. CHUBBS:
 3 A. Yes, that's correct.
 4 FITZGERALD, KC:
 5 Q. If we could go for a moment to PUB-CA-26B,
 6 I'm not sure if we have the right –
 7 (11:45 a.m.)
 8 BROWNE, KC:
 9 Q. It's A, you said B.
 10 FITZGERALD, KC:
 11 Q. Sorry, if you could just scroll through that
 12 RFI, please, for me. A little further,
 13 please. I'm looking for the Puget Sound
 14 Energy, okay, so footnote No. 5, if you
 15 could open that please? The executive
 16 summary, and so what you'll see here, the
 17 quote "Why are we upgrading our meters?"
 18 And it says here, "Our automatic meter
 19 reading, AMR system is approaching the end
 20 of its projected lifespan." And it says,
 21 "Today AMR hardware and software are
 22 becoming increasingly obsolete making them
 23 difficult to support and maintain." And
 24 that's part of the record. If we could go
 25 to the same—sorry, you've seen this

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1 information before?
 2 MR. CHUBBS:
 3 A. No, I haven't read this, but I'm certainly
 4 familiar with AMR technology.
 5 FITZGERALD, KC:
 6 Q. Okay, and if we could go to again UBCA-026B
 7 which I think is where we are and the BC
 8 Hydro footnote No. 6, just scroll down to
 9 the executive summary, okay. In the second
 10 paragraph there, I don't know if you are
 11 with me, Mr. Chubbs? The executive summary,
 12 this is from BC Hydro, "BC Hydro's smart
 13 metering program is an important
 14 foundational step in modernization of BC
 15 Hydro's electrical system. Program involves
 16 replacing existing customer meters now
 17 becoming obsolete with a comprehensive smart
 18 metering system." Had you seen that quote
 19 before?
 20 MR. CHUBBS:
 21 A. No, I had not.
 22 FITZGERALD, KC:
 23 Q. You know, based on the information that we
 24 have, you know, that 70 percent of Canadian
 25 households and businesses are currently

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1 using smart meters, the forecast of 94
 2 percent penetration by 2027, the legislation
 3 in Ontario and BC, the New Brunswick Power
 4 initiatives and the Nova Scotia Power
 5 initiative, the Puget Sound reference of
 6 obsolete meters and BC Hydro, would you
 7 agree with me that based on the evidence, it
 8 likely will be that the smart meter
 9 technology is now the metering technology of
 10 choice in the industry or very soon will be?
 11 MR. CHUBBS:
 12 A. I would agree that smart meters are, would
 13 be most common in the industry and if you
 14 want to call that the meter of choice,
 15 that's fine.
 16 FITZGERALD, KC:
 17 Q. But Newfoundland Power, as I understand it,
 18 there's nothing imminent about any smart
 19 meter initiative, is that correct?
 20 MR. CHUBBS:
 21 A. It would depend on what you would call
 22 imminent, you know.
 23 FITZGERALD, KC:
 24 Q. We'll say faster than the load research
 25 study.

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1 MR. CHUBBS:
 2 A. Perhaps go back to the Puget Sound page for
 3 a second. You know, the first sentence
 4 there that their AMRs are approaching end of
 5 life and the last sentence, first paragraph,
 6 going to be obsolete. The middle sentence
 7 there, you know, says that "Puget Sound were
 8 one of the first adopters of AMR technology
 9 in the late '90s", right, so they were ahead
 10 of the time. So I would think that the fact
 11 that they are considering their meters
 12 obsolete is probably because they were some
 13 of the first vintage AMR meters. We started
 14 looking at AMR technology in the early 2000s
 15 ourselves. We looked at it probably for
 16 about five years before we were comfortable
 17 with the technology and we understood the
 18 efficiencies and the safety implications as
 19 well that they provided to our employees.
 20 We have not received any indication from our
 21 meter supplier who is Itron and I mentioned
 22 this morning that they are the largest
 23 manufacturer of electricity meters, AMI and
 24 AMR and standard digital meters in North
 25 America, that AMR is obsolete. We know that

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1 more utilities are using AMI technology and
 2 that's been implemented for many reasons.
 3 As we indicated in our response, it's either
 4 been legislated or as we're seeing here in
 5 our region, in Nova Scotia and New
 6 Brunswick, it's been determined to be least
 7 cost for customers. When we looked at AMR
 8 technology and decided to transition from
 9 our standard meter reading, I'll say walk-by
 10 meters which was a very inefficient way of
 11 doing it, and we did the economic analysis
 12 to determine whether AMR technology made
 13 sense for Newfoundland Power and would
 14 reduce operating costs sufficiently enough
 15 that it was least cost total for our
 16 customers, we did look at AMI technology at
 17 the time and it was clear to us that AMI was
 18 not least cost for Newfoundland Power. Our
 19 AMR system that we implemented in the period
 20 from around 201 to 2017, cost about 25
 21 million dollars to install those meters.
 22 And they save, in terms of meter reading
 23 labour costs and the fuel and vehicle cost
 24 that it took to read all those meters
 25 manually every single month, over 2 million

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1 dollars a year, so when you look at the life
 2 of that meter, I think 18 years is the
 3 standard life for a meter in our
 4 depreciation study, you look at 2 million
 5 dollars over 18 years, you get the present
 6 value of that and you compare it to 25
 7 million dollars and it was least cost for us
 8 to go with AMR meters, right, the drive-by
 9 technology. Our meter readers can collect
 10 ten times as many readings in a run of a day
 11 versus our old approach. AMI also reduces
 12 that cost and can effectively get the meter
 13 reading costs down to the cost to actually
 14 read the meters and collect the readings,
 15 you can effectively get that to zero, right.
 16 We got 80 percent with AMR, we could have
 17 got the other 20 percent if we had gone AMI,
 18 but the cost was four times as much. The
 19 most was 100 million dollars, right, and
 20 when you do that same economic analysis,
 21 okay, now I'm saving 2 million a year
 22 versus, you know, 2.4 million a year and you
 23 look at that over the life of the meter and
 24 you get a present value of that, it's not
 25 even close to the 100 million dollar

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1 investment that AMI technology would
 2 require. So at that time we determined that
 3 AMI was not least cost for our customers and
 4 we still firmly believe today that the way
 5 we read our meters is least cost.
 6 FITZGERALD, KC:
 7 Q. Yes, but that's the only—that's one
 8 advantage of AMR, but you know, it appears
 9 that the weight of the evidence is that the
 10 industry is turning towards smart readers.
 11 You know, the fact that AMR might have been
 12 the state of the art technology when this
 13 decision was made is one thing, but we're
 14 not in 2024, you know, so does the same
 15 logic apply, it was least cost then, you
 16 know, we do know that Newfoundland Power has
 17 had the experience with their customer
 18 service computerization which nearly went
 19 obsolete, you argued or Newfoundland Power
 20 argued was obsolete, but that was a, you
 21 know, but there was a huge cost in replacing
 22 that but it was almost, the way it was,
 23 Newfoundland Power portrayed it, it was a
 24 necessary expense. So, you know, catching
 25 up with technology, making sure that least

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1 cost electricity is provided, wouldn't
 2 Newfoundland Power be motivated now to
 3 change horses, if I could put it that way or
 4 adopt AMI?
 5 MR. CHUBBS:
 6 A. I mean AMI and, you know, comparing it to a
 7 customer service system is certainly two
 8 different things, right, our customer
 9 service system was absolutely obsolete, you
 10 know, needed to be replaced and so we had
 11 to, we had no choice. I think the question
 12 here really is about the obsolescence and as
 13 I said, we haven't gotten any indication
 14 from our supplier or industry that AMR
 15 meters are obsolete to the point where we
 16 know we need to go out and change all of our
 17 meters from AMR to AMI, we have no
 18 indication that that's the case and in fact,
 19 when we talked to the meter manufacturers,
 20 another thing that these, so these meter
 21 manufacturers they supply electricity meters
 22 but they also do water meters, you know, and
 23 they effectively look the same, right, it's
 24 just they're measuring water versus
 25 electricity. Electricity meters, there's

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1 value in that more granular data, the 15
 2 minute interval data, so you know, that
 3 makes part of your business case in terms of
 4 whether you want to shift to AMI, but when
 5 it comes to water meters, water meters still
 6 rely, for the most part, on that one monthly
 7 meter reading, right, so the indication we
 8 get from meter manufacturers is AMR
 9 technology is going to be around for a long
 10 time, you know. It's just the chip of the
 11 circuit board that's in the meter, you know,
 12 that's communicating the reading, so in our
 13 view it isn't an obsolescence issue, but we
 14 have continually looked at AMI technology
 15 and we looked—sorry –
 16 FITZGERALD, KC:
 17 Q. No, go ahead, finish your thought.
 18 MR. CHUBBS:
 19 A. So we looked at, I looked at it in 2012, we
 20 looked at it as part of our last potential
 21 study that was completed by Dunsky, this was
 22 2019, so that was part of our
 23 electrification conservation demand
 24 management plan that we put forward, and
 25 when Dunsky looked at it, they looked at it

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1 from a Time-Of-Use rates perspective, right,
 2 and their determination was that it did not
 3 pass the economic test that you put around
 4 these conservation demand management
 5 programs, right, and really what that means
 6 is that the cost upfront that you would
 7 incur from installing the 100 million dollar
 8 AMI technology would not be offset by the
 9 benefits that you would get through Time-Of-
 10 Use rates and peak shifting, right. And the
 11 reason for that was that we had what, we
 12 have a very flat load profile in
 13 Newfoundland—in our system, so, you know,
 14 peak day for Newfoundland Power or for the
 15 Island system, you know, we could, the peak
 16 could come up in the morning and effectively
 17 stay fairly flat, you know, you'd get a bit
 18 of a dip in the afternoon, but stay up again
 19 the evening, right. What AMI and Time-Of-
 20 Use rates do for you is they incent
 21 customers to shift their usage from on peak
 22 to off peak times. The Dunsky review
 23 highlighted the fact that our flat load
 24 profile limited how much load you can shift
 25 from on peak to off peak, but what they did

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1 indicate was that with more electrification
 2 and more electric vehicles coming on the
 3 system, that our system peak would likely
 4 shift, potentially shift to an evening peak,
 5 like a constant evening peak because
 6 everybody would get home at the end of the
 7 day, they'll all plug in their electric
 8 vehicles and when there's enough electric
 9 vehicles in the province, we will have, you
 10 know, a regular supertime peak, you know,
 11 on the system. And at that time it would
 12 make sense, it may make sense to adopt Time-
 13 Of-Use rates to incent customers to charge
 14 their vehicle, they can still plug in at
 15 5:00, but they could program it to charge,
 16 you know, 9:00, 11:00, whatever you kind of
 17 set that around. So you can shift that peak
 18 to overnight hours ideally is what you'd be
 19 going for. In terms of the cost benefit of
 20 that, what we're really talking about is
 21 generation, right, so would AMI meters and
 22 Time-Of-Use rates shift load from the
 23 supertime peak, that would materialize with
 24 more electric vehicles, to an overnight peak
 25 to kind of keep the total load flat to a

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1 point where you could avoid installing
 2 generation on the system at some point in
 3 the future because of this load growth,
 4 right. And so, you know, you'd really need—
 5 you're talking about probably having to
 6 shift about 50 megawatts of load, right, so
 7 you don't have to build a 50 megawatt
 8 generator, you know. So when we look at
 9 stacking, you know, the potential benefits,
 10 there are some of the other benefits that we
 11 have highlighted in our response there, we
 12 would cut some meter reading cost, the
 13 disconnect, reconnect process, you could do
 14 that remotely and not manually, but it's
 15 really what we are keeping an eye on is that
 16 evening supertime peak when we're going to
 17 see that on the system in the future, and
 18 will we be able to shift enough load to
 19 overnight hours, right.
 20 (12:00 p.m.)
 21 FITZGERALD, KC:
 22 Q. Okay, so you mentioned Dunsky, but I
 23 understand that, I mean, Dunsky only studied
 24 the benefits of smart meters when it came to
 25 load shifting, but there's other benefits,

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1 as you just mentioned, to smart meters. You
 2 know, there's the automatic outage
 3 detection, you mentioned remotely connect,
 4 disconnect, enablement of distributed energy
 5 generation, the ability to provide customers
 6 personalized energy savings tips and
 7 recommendations and the ability to provide
 8 outage and power restoration notifications,
 9 so those are other things, benefits of smart
 10 meters that I don't believe Dunsky studied,
 11 correct?
 12 MR. CHUBBS:
 13 A. That's correct, yes.
 14 FITZGERALD, KC:
 15 Q. Right, and I don't—correct me if I'm wrong,
 16 but I don't think Dunsky have rate design
 17 experts. I mean, if you don't know, we can
 18 check that, but I mean, I didn't believe
 19 that that was what they were doing.
 20 MR. CHUBBS:
 21 A. And the reason I paused there is the Dunsky
 22 report gets into pretty heavy detail on rate
 23 design, what time of day you'd be looking at
 24 the rate, you know, a peak rate versus off
 25 peak rate. They get into the ratio of, you

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1 know, what works better, a two to one ratio,
 2 you know, you pay 10 cents during off peak
 3 and 20 cents on peak or is it 8 cents and 24
 4 cents, three to one ratio, on peak, off
 5 peak, so they are pretty detailed in that
 6 analysis and how much each type of, you
 7 know, scenario would shift—how much load
 8 that would shift. So, you know, and they’re
 9 a pretty significant consulting firm, so I
 10 just pause on the comment that they don’t
 11 have rate experts.
 12 FITZGERALD, KC:
 13 Q. Well we can doublecheck that. But, you
 14 know, I guess Dunsky has one view of things,
 15 but we also have the weight of all the other
 16 evidence of what utilities are doing in
 17 Canada and the US re: smart meters, and it
 18 looks like Newfoundland Power is isolated in
 19 their approach. They are not, there’s no
 20 initiative, strong initiative, high profile
 21 or high priority motivation to get smart
 22 meters started. There’s nothing going on
 23 that’s concrete.
 24 MR. CHUBBS:
 25 A. Again, we’ve looked at smart meters, they

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1 are not least cost for customers in
 2 Newfoundland at this time. We are
 3 continually evaluating smart meters and
 4 evaluating what the potential benefits in
 5 the future may be and when we feel we get to
 6 that point where smart meters become least
 7 cost for customers, we would certainly be
 8 interested in installing smart meters on a
 9 go-forward basis, but until we get to that
 10 point, it wouldn’t be appropriate to incur
 11 that significant capital investment at this
 12 time without seeing, realizing the benefits
 13 that would need to be there for customers.
 14 And I think it’s also important to point out
 15 that, you know, meters have a lifespan,
 16 right, so if we were to go to AMI meters
 17 today and adopt Time-Of-Use rates today, but
 18 there’s no benefit to the system or
 19 customers for ten years from now, well you
 20 effectively use up ten years of that meter
 21 and then you’re into the tail end of the
 22 life of the meter before you’ve gotten any
 23 benefit from it, so we feel like the way
 24 things are kind of lining up, our meters
 25 where we started our installation in 2012,

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1 2013, finished it in 2017, 2018, meters
 2 last, you know, the expected life is around
 3 18 years, so when we hit that 2030 to 2034
 4 timeframe, which is actually the same
 5 timeframe indicated by Dunsky, so it kind of
 6 lines up with the life of our current
 7 meters, that’s the more appropriate time to
 8 be considering AMI for our system.
 9 FITZGERALD, KC:
 10 Q. Okay, and I believe what you just stated
 11 that this is reflected in the Rebuttal
 12 Evidence that’s been filed. I was just
 13 going to take you to that at page 47, go
 14 there quickly, and at line 15 and this is
 15 essentially, I believe, what you’ve just
 16 told us, it says, “The implementation of AMI
 17 meters at the present time does not
 18 facilitate least cost provision of service
 19 for a number of reasons.” And you go on, so
 20 that’s the statement, that’s the evidence,
 21 but can we go to CA-NP-034, scroll down
 22 please to paragraph—okay, bottom of the
 23 second last page there, it says, “The
 24 Company is preparing to model the costs and
 25 benefits associated with implementing AMI

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1 technology.” So when I read that, that
 2 tells me that there’s not been a calculus
 3 done yet as to whether AMI is least cost
 4 because you don’t know, according to this,
 5 the study hasn’t been done.
 6 MR. CHUBBS:
 7 A. We know the cost of installing AMI meters,
 8 it’s 100 million dollars plus, potentially.
 9 When we look at the benefits and we’ve
 10 looked at the benefits of converting our
 11 meter reading technology in the past, there
 12 are two operational benefits that we see to
 13 go with AMI. First is you effectively get
 14 your meter reading cost to zero, right, so
 15 we’d save, you know, about 500,000 dollars a
 16 year on meter reading cost for the life of
 17 the meter, right, so 500,000 dollars over 18
 18 years, what’s that, 9 million bucks, right,
 19 so it’s 100 million dollar cost, 9 million
 20 saved. The other benefit that we see in our
 21 operations is the remote disconnect,
 22 reconnect, right, and there’s probably, we
 23 have crews in the field that routinely do
 24 that work and it’s probably about the same
 25 amount, 500,000, probably a little less, of

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1 labour we would be able to reduce because we
 2 wouldn't have to send crews or our field
 3 service representatives out to customer's
 4 premises to disconnect the meter, we could
 5 do it remotely from a computer, right. So
 6 that's another, you know, over 18 years, so
 7 that's another 9 million dollars or so, so
 8 we're 20 million dollars into that 100
 9 million dollar investment. Beyond that,
 10 there's no significant real cost that we see
 11 until we get to that point where we have
 12 that true supertime peak that you can shift
 13 and you're really talking about avoided
 14 generation. So what we have done is we've—
 15 and this really started from that Dunskey
 16 report and that report indicated to us that
 17 the 2030 to 2034 timeframe is around when
 18 AMI would be a net benefit to customers,
 19 right, so we took that timeframe and we also
 20 know how long it would take to install AMI
 21 meters. It's about a five-year project,
 22 that's what it was for New Brunswick Power
 23 and Nova Scotia Power, their projects were
 24 five years to install, and that's roughly
 25 what we were for all of our meter change-

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1 outs, right, so it's a significant effort.
 2 So we work back from that timeframe and at
 3 that time for us it was indicating, well
 4 probably around 2027, 2028, that might be
 5 when you start an AMI implementation because
 6 you want them in place certainly when you
 7 can start getting those benefits, right, as
 8 soon as you can, so you're going to need to
 9 start early. So what we've done is we
 10 worked with a company, Capgemini they're
 11 called and they're a consultant that have
 12 helped utilities with their AMI business
 13 cases, so they understand the technology
 14 really well and they have developed for us a
 15 tool, you know, that we can routinely update
 16 the cost of the technology, if we identify
 17 benefits or even new potential benefits, we
 18 can layer those in and do that economic
 19 analysis. It's not even close to passing
 20 right now, so it's not something that we
 21 feel we need to do any kind of deep study
 22 into, but the point of that, the purpose of
 23 that tool is for us to try and model and
 24 look forward when we get to that point, you
 25 know, because you really need to be kind of

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1 looking ahead on when we're going to start
 2 seeing those benefits and try to pinpoint
 3 that as best you can and then work back and
 4 say, okay, now here's what I need to install
 5 these meters, right. So we've got this tool
 6 in place now that does that for us, right,
 7 that we're working with. Again, at this
 8 time AMI meters are not least cost for
 9 Newfoundland Power's customers.
 10 FITZGERALD, KC:
 11 Q. But that's the point, that's your
 12 conclusion, but that tells me that the study
 13 has already been done, but in CA-NP-034, it
 14 allows that you're still looking at it, so
 15 that analysis, that conclusion it can't be
 16 reached it. I mean, you went through it
 17 and, you know, there are some assumptions, I
 18 guess, that currently it's not providing
 19 least cost, but if that's the case, why is
 20 it being studied or how can you say that
 21 while you're studying it?
 22 MR. CHUBBS:
 23 A. So we've studied it a number of times,
 24 right, to see whether it's least cost or not
 25 and what came out of the Dunskey study was

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1 that it could become least cost within the
 2 next decade, right, and with a big shift in
 3 technology like that and a five-year
 4 implementation, so we're talking now it
 5 could be five years from implementing,
 6 right, so we're continually looking and
 7 evaluating. We've got a new study happening
 8 right now, our next electrification
 9 conservation demand management study being
 10 completed by Posterity Group and they'll
 11 look at the same thing, right, and they'll
 12 take the most recent data in terms of
 13 electrification, home heating conversations,
 14 EVs, to give us a sense of when we will see
 15 and when we would see that new supertime
 16 peak in the future, and that might, you
 17 know, might be earlier, might be later, you
 18 know, it's really hard to tell at this
 19 point, but we've got this tool now that
 20 allows us to continually evaluate it as
 21 we're going, right. And we're also looking
 22 at, you know, the other potential benefits
 23 here, they are small, but when I look at
 24 Nova Scotia and New Brunswick, you know,
 25 they layered on a lot of benefits to kind of

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1 get to the, to reach that, I think for New
 2 Brunswick Power it was 123 million dollar,
 3 120 million dollar investment, but they had
 4 a lot of benefits layered in there, right,
 5 smaller ones.
 6 FITZGERALD, KC:
 7 Q. You mentioned the potential study, that's
 8 the Posterity potential study, but, you
 9 know, are smart meters even mentioned in the
 10 scope of work for that study? Are they
 11 looking at that at all?
 12 MR. CHUBBS:
 13 A. They're looking at conservation and demand
 14 management opportunities, the potentials
 15 that are there and Time-Of-Use rates is one
 16 of those and they evaluate that against the
 17 marginal cost on the system, so when they
 18 look at any technology and it might, you
 19 know, from insulation, you know, they will
 20 evaluate the cost of insulation, what are
 21 the kilowatt hours, what's the energy you're
 22 going to produce, what is the impact on the
 23 system demand, right, and they do that
 24 economic evaluation and they'll look at
 25 Time-Of-Use rates and whether Time-Of-Use

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1 right.
 2 FITZGERALD, KC:
 3 Q. Right, but you know, not to quibble or be
 4 argumentative, but they don't mention smart
 5 meters specifically, if you search their
 6 report, it's not there, smart meters is not
 7 there.
 8 MR. CHUBBS:
 9 A. No, and I think it's important to point out
 10 like, you know, Time-Of-Use rates and smart
 11 meters are not the same thing, right. You
 12 know, smart meters have a bit like a thing
 13 like a Venn diagram, I guess. Like smart
 14 meters have a lot of benefits and implement
 15 Time-Of-Use rates is one of those benefits
 16 and there's many ways to go about
 17 conservation and demand management and Time-
 18 Of-Use rates is one of those benefits, you
 19 know, but they don't overlap, you know, it
 20 is one part of the potential study, CDM is,
 21 and CDM is one benefit of smart meters,
 22 right, so they are, they are related but
 23 they're not perfectly correlated.
 24 (12:15 p.m.)
 25 FITZGERALD, KC:

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1 rates would shift peak enough to reduce that
 2 demand impact, right, and that demand impact
 3 comes from the cost of adding new generation
 4 on the system, right, so the numbers, the
 5 inputs that they use in that evaluations are
 6 that new generation technology.
 7 FITZGERALD, KC:
 8 Q. No, I understand, but correct me if I'm
 9 wrong, the Posterity potential study does
 10 not specifically reference smart meters.
 11 MR. CHUBBS:
 12 A. You would need smart meters to implement
 13 Time-Of-Use rates.
 14 FITZGERALD, KC:
 15 Q. Yeah, but they don't mention it, it's not
 16 part of their study, correct?
 17 MR. CHUBBS:
 18 A. They are not being asked to evaluate the
 19 cost benefit of smart meters for
 20 Newfoundland Power, they would be asked to
 21 evaluate potential conservation demand
 22 management alternatives and if Time-Of-Use
 23 rates is one of those alternatives that they
 24 identify, that would be, we would use that
 25 benefit in our analysis for smart meters,

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1 Q. Just to step back a bit, though, in your
 2 position as VP in your department and you
 3 know that Ontario and BC have mandated smart
 4 meters, does that give you pause for thought
 5 ever that perhaps Newfoundland Power should
 6 adopt smart meters sooner than later?
 7 MR. CHUBBS:
 8 A. No, it does not.
 9 FITZGERALD, KC:
 10 Q. So you're confident then that Newfoundland
 11 Power's approach is the correct approach,
 12 even though Newfoundland Power has indicated
 13 there are many benefits of smart meters to
 14 consumers, Newfoundland Power is not
 15 prepared at this point to proceed with a
 16 serious smart meter initiative imminently?
 17 MR. CHUBBS:
 18 A. Implementing smart meter technology is not
 19 least cost for customers of Newfoundland
 20 Power at this time.
 21 FITZGERALD, KC:
 22 Q. Okay, and so we've gone through that, that's
 23 your conclusion although the jury is not out
 24 on that because you're still studying it?
 25 MR. CHUBBS:

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1 A. We've studied it enough to know smart meters
 2 are not least cost for customers at this
 3 time and we are continuing to study it to
 4 determine if and when they may become least
 5 cost for our customers.
 6 FITZGERALD, KC:
 7 Q. So, I think we flogged that to death. Let's
 8 move on to other matters. The Provincial
 9 Government announced the finalization of its
 10 rate mitigation plan recently, as you know.
 11 Have you received any direction from the CEO
 12 or CFO with respect to the rate mitigation
 13 plan?
 14 MR. CHUBBS:
 15 A. No, I have not.
 16 FITZGERALD, KC:
 17 Q. The press release, and I don't know if we
 18 have to get there. I think it's part of the
 19 record. November 9th, 2023. I believe
 20 you're familiar with it, but we can draw it
 21 up just in case there's a question about it.
 22 November 9th. Okay. This press release
 23 states that Newfoundland Power is proposing
 24 a 1.5 percent increase in customer rates on
 25 July 1, 2024, 2024 rate of return on rate

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1 base application, a further 5.5 increase on
 2 July 1, 2025 in this GRA. Mr. Murray is
 3 quoted as saying, "we know that these
 4 challenging times for our customers and we
 5 understand that reliable service at
 6 affordable rates is more important now than
 7 ever." Have you received any direction from
 8 Mr. Murray with respect to addressing these
 9 challenging times for the consumers?
 10 MR. CHUBBS:
 11 A. I would say I get direction from Mr. Murray
 12 all the time, when you think of how we
 13 manage our business, providing reliable
 14 service, ensuring that its least cost for
 15 customers, identifying efficiencies in our
 16 operations. That's routine conversation
 17 with Mr. Murray and I.
 18 FITZGERALD, KC:
 19 Q. But specifically, I mean we talked about the
 20 rate shock. We talked about, you know,
 21 there's unprecedented increase of, you know,
 22 the cost – not the cost, but the expense of
 23 electricity to consumers in the current
 24 environment and your company's in the
 25 business of selling electricity and of

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1 course, you know, the higher the price goes
 2 up, you know, the more difficult it is for
 3 both you and the consumer. So, you know,
 4 specifically, was there any initiative given
 5 to your department to either look at
 6 operating costs, look at any kind of savings
 7 that could occur in a kind of situation
 8 where like this is again a five-alarm fire
 9 is going on here or is it there was no
 10 reaction to the challenging times statement?
 11 MR. CHUBBS:
 12 A. You know, we understand – I certainly
 13 understand it's challenging times for
 14 customers and it is engrained in
 15 Newfoundland Power's operations that we are
 16 constantly looking for ways to reduce costs
 17 for our customers. Throughout the evidence,
 18 there's many examples of areas where we've
 19 been able to achieve cost reductions. We
 20 just spoke about meter reading, and that's
 21 reduced millions in operating costs for our
 22 customers and those are sustained benefits,
 23 right, that last throughout this period.
 24 LED streetlight technology, that reduced our
 25 operating cost 1.8 million dollars a year,

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1 right, from when we started converting from
 2 our high-pressure sodium to our LED
 3 streetlights. That's a sustaining benefit,
 4 you know, that carries on through this.
 5 There's many examples of the smaller
 6 incremental operating efficiencies that
 7 we've been able to achieve in our operations
 8 over the last decade that we have planned
 9 and are implementing right now this year in
 10 our current year capital budget in terms of
 11 our operational technologies that find many
 12 little efficiencies in our operations as
 13 well, right, and those have sustaining
 14 benefits and it is something that
 15 Newfoundland Power is constantly focused on
 16 and will continue to focus on and I can
 17 assure you that we have our customers'
 18 interests top of mind at all times.
 19 FITZGERALD, KC:
 20 Q. On another topic, the provisional capital
 21 budget application guidelines, which you're
 22 familiar with, I believe, were issued by the
 23 Board on December 20, 2021 and so that's two
 24 and a half years ago, and we understand that
 25 Newfoundland Power still does not have an

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1 asset management program that meets the
 2 requirements set out in the provisional
 3 guidelines. Is that correct?
 4 MR. CHUBBS:
 5 A. I'm not sure I would necessarily agree.
 6 Newfoundland Power's asset management
 7 program has provided consistent benefits for
 8 our customers, in terms of reliability and
 9 in terms of least cost management of the
 10 electricity system. The provisional
 11 guidelines that were developed a couple
 12 years ago, they have some different
 13 criteria. They're looking for more granular
 14 data, more historical data on things like
 15 asset replacement, and it's data that
 16 effectively Newfoundland Power doesn't have,
 17 you know, and we can't go back in time and
 18 get that data, I mean, when you're looking
 19 at historical trends and things like that.
 20 We've got a few things going on in our
 21 operations that have triggered us to do a
 22 review of how we do asset management at
 23 Newfoundland Power. The biggest and most
 24 important one, as I mentioned in my opening
 25 statement, is this wave of aging assets that

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1 we have coming our way. The system was
 2 built in the '60s and '70s. Poles,
 3 transformers, conductor have lives of 50 to
 4 60 years. You do the math and in the next
 5 decade or two, we are going to have a lot of
 6 asset replacement to complete at
 7 Newfoundland Power. We want to ensure that
 8 we do that as cost effectively as we can
 9 and, you know, certainly agree that the more
 10 data and information that we have at our
 11 fingertips to help make those decisions, the
 12 better it is for our customers. So, that's
 13 number one.
 14 Number two is the provisional
 15 guidelines. So, the Board is clearly
 16 interested in more data on our assets and
 17 how we're making our decisions on how we
 18 maintain and replace our assets. And then
 19 the third really is our technology. So, the
 20 technology that we have in place now for
 21 managing our asset management system, so all
 22 of our assets was implemented about 20 years
 23 ago and is at end of life. The vendor has
 24 indicated that it's no longer supported
 25 beyond the end of 2026. So, we have to

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1 replace that technology and that's a very
 2 significant piece of technology for us.
 3 It's how we manage all of our electricity
 4 assets. It has 400,000 assets, you know,
 5 and all the data and history and all of our
 6 preventative maintenance programs in that
 7 piece of software.
 8 So, all of these things are kind of all
 9 happening at the same time and so that for
 10 Newfoundland Power initiated a review of our
 11 asset management program and how we go about
 12 asset management to ensure that it's, you
 13 know, appropriate, consistent with industry
 14 best practice and the like. So, we've – you
 15 know, we're into our third phase of this
 16 review now and you know, expect that we'll
 17 be having conversations with the Board
 18 through our capital budget application on
 19 what's that going to mean for Newfoundland
 20 Power going forward.
 21 FITZGERALD, KC:
 22 Q. Okay. So, I take from your answer then, no.
 23 You have not yet met the requirements set
 24 out in the Board's provisional capital
 25 budget application guidelines. You do have

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1 a small A asset management program, which
 2 you've historically used, but can I ask you
 3 then, when do you expect to be in a position
 4 to meet the requirements set out in the
 5 Board's provisional capital budget
 6 application guidelines?
 7 MR. CHUBBS:
 8 A. I think that it's not the right
 9 characterization to say we don't meet the
 10 guidelines. The Board acknowledged through
 11 the guidelines, you know, the fact that
 12 they're provisional and also that, you know,
 13 encourage the utilities to strive, because
 14 they understood utilities did not have all
 15 the information that was in there, to strive
 16 to meet the spirit and intent of the
 17 guidelines and we've certainly done that,
 18 and our capital budget application has more
 19 data than its ever had, right. The
 20 interrogation process, you know, the RFIs
 21 and the technical conferences and
 22 introduction presentations, the new elements
 23 that have been brought to our capital budget
 24 application have certainly increased. So, I
 25 certainly believe that we are meeting the

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1 spirit and intent of the provisional
 2 guidelines that were put in place.
 3 FITZGERALD, KC:
 4 Q. And so, at some point, you do expect to be
 5 in compliance with the provisional capital
 6 budget application guidelines?
 7 MR. CHUBBS:
 8 A. Oh, absolutely. We will be working towards
 9 that goal. It is not an overnight thing.
 10 So, we're doing this review now and it'll
 11 inform us on where we need to go in terms of
 12 asset management, but that's going to take
 13 time, you know. It's looking at assets in a
 14 different way. One example is like a health
 15 indices, you know, something that we don't –
 16 when we inspect a line today, and one of our
 17 inspectors goes out and he looks at a pole
 18 and he sees that well, that pole is about to
 19 fail, it's deteriorated, right, so it's – it
 20 fails inspection, for example, and that's
 21 captured in our asset management system,
 22 right. All the other poles that the
 23 inspector is looking at, you know, they get
 24 a pass. You know, it's like a pass/fail.
 25 That's the kind of way we do our inspections

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1 now, you know. And again, that's worked for
 2 us for a lot of years. But you know, one of
 3 the emerging, the newer way to look at it is
 4 you assess the health of that pole overall,
 5 right. So, you aren't – you're looking at
 6 every pole. Well, you're giving it a
 7 rating. So, this is a one out of ten in
 8 terms of remaining life versus a ten out of
 9 ten, you know, for a new line. And that
 10 allows you to step back and look at all of
 11 your assets once you gather all that data
 12 and look at all your assets and get kind of
 13 a general sense of the overall health of
 14 your distribution or transmission
 15 infrastructure and then as your recurring
 16 maintenance occurs, is that health generally
 17 degrading or improving or staying steady
 18 over time, right. And the way we do it
 19 today doesn't necessarily give us that
 20 information. So, we think like that's
 21 likely a part of our inspection program
 22 going forward, right, is you're capturing
 23 more data on your assets. But it's going to
 24 take time to get that data in place and to
 25 be able to evaluate the data on a time-based

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1 perspective, you know.
 2 FITZGERALD, KC:
 3 Q. Sure.
 4 MR. CHUBBS:
 5 A. So, it's going to take time to implement.
 6 FITZGERALD, KC:
 7 Q. Understood, and really that was the purpose
 8 of my question, I guess, you know, try to
 9 put parameters around the time. Do you have
 10 your best estimate as to what time it's
 11 going to take?
 12 MR. CHUBBS:
 13 A. I'm not certain that I can say it's a
 14 definitive time, you know. There will be
 15 things that we change quickly. Our
 16 technology is one thing that's got to change
 17 quickly because it's approaching end of
 18 life. There will be things that'll take a
 19 long time to capture the data to be able to
 20 make the appropriate decisions on and
 21 perhaps it's ten years' worth of data. So,
 22 that – so, you know, you got some things
 23 we'll do in the next couple years and some
 24 things that could take ten years.
 25 One of the key elements, and we're

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1 evaluating our asset management program
 2 today against ISO 55000, which is the
 3 international standard for asset management,
 4 and the real cornerstone of that standard is
 5 continuing improvement, you know. It's how
 6 are you evaluating what you're doing every
 7 year, identifying areas where you can
 8 improve and do things better and then how
 9 you're tracking and implementing, you know,
 10 and so, you know, I really see it as more of
 11 I'll say a change in direction and a bit of
 12 a longer-term journey. There'll be specific
 13 things that we will implement that'll have
 14 timeframes and schedules around them, but
 15 you know, I almost view it like our health
 16 and safety system, you know. That's the way
 17 our health and safety system is based on,
 18 you know. It's looking at your data every
 19 year. What is it telling you, and as a
 20 company, what do we need to focus on and try
 21 to do better? And that'll be an annual
 22 thing at Newfoundland Power, just like it is
 23 for health and safety and environment.
 24 FITZGERALD, KC:
 25 Q. So, the short answer is you don't know when

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1 the asset management – you’ll be complying
 2 completely with the Board’s provisional
 3 capital budget application guidelines? You
 4 just can’t say? You don’t know?
 5 (12:30 p.m.)
 6 MR. CHUBBS:
 7 A. The short answer is it is not a definitive
 8 endpoint, right. It is not a -
 9 FITZGERALD, KC:
 10 Q. All right. If we could turn now to specific
 11 operating costs, and I guess to assist us in
 12 this, we’d need to have a look at Exhibit 3,
 13 which is Undertaking U-01. So, Mr. Chubbs,
 14 what’s your role with respect to compiling
 15 operating cost data in context of this GRA?
 16 MR. CHUBBS:
 17 A. The operating cost data is taken from a
 18 number of inputs within the company. So,
 19 it’s really a departmental exercise in
 20 determining, you know, what costs we’ve
 21 incurred, what we see going forward in terms
 22 of any known and measurable changes that are
 23 there. It’s taking inputs of things like
 24 our labour inflation rates, you know, GDP as
 25 well. So, it’s compiled from a number of

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1 sources and as that’s assembled, it is
 2 reviewed by our executive team to determine
 3 whether we feel, you know, it’s appropriate
 4 and we’ve done all the – we’ve captured
 5 everything that we should be looking at in
 6 there. So, that’s essentially how it works.
 7 FITZGERALD, KC:
 8 Q. Okay, thanks. If we look at Exhibit 3
 9 that’s on the screen there, line 15,
 10 operating expenses and here we have
 11 operating expenses go from the 73.4 in 2023
 12 to 78 in 2024, which is a significant
 13 increase. We’ve calculated as about a 7.2
 14 percent increase, if you would agree with
 15 that or disagree? Would you accept that,
 16 that it’s a 7.2 increase?
 17 MR. CHUBBS:
 18 A. I’m sorry, which year? I was flipping
 19 through my binder.
 20 FITZGERALD, KC:
 21 Q. Okay, sorry. So, the operating expense goes
 22 from 73.4 in 2023. I’m looking at line 15.
 23 MR. CHUBBS:
 24 A. Yeah.
 25 FITZGERALD, KC:

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1 Q. To 78.7 in 2024. So, that’s a roughly 5.3
 2 million increase. We calculate that to be
 3 7.2 increase over the time period.
 4 MR. CHUBBS:
 5 A. Yes, that’s correct.
 6 FITZGERALD, KC:
 7 Q. Okay. So -
 8 MR. CHUBBS:
 9 A. And I just point out that it may be better
 10 if we could work with Exhibit 1 or 2 because
 11 I know there are operating expenses that are
 12 in our – I’ll say my Section 2 evidence and
 13 are shown specifically in Exhibit 1 and 2
 14 that I think might be covered in footnote 3
 15 here perhaps, but I know it’s in the RFIs as
 16 well where – yeah, so, you see footnote 3,
 17 right. So, there’s adjustments in non-
 18 regulated expenses, employee future benefits
 19 and things like that that kind of move in
 20 and out.
 21 FITZGERALD, KC:
 22 Q. Yeah, but that wouldn’t really affect -
 23 MR. CHUBBS:
 24 A. In terms of overall change, you’re right,
 25 yes. We can agree with that.

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1 FITZGERALD, KC:
 2 Q. So, let’s just stay there for now. So,
 3 during this same period or in the June 5th
 4 policy statement from the Bank of Canada,
 5 the Bank of Canada indicated that the
 6 inflation rate was moved down to 2.7
 7 currently. Now, I know that changed
 8 yesterday to 2.9 I believe, but would you
 9 accept that as the current environment we’re
 10 in financially?
 11 MR. CHUBBS:
 12 A. Sure, yes.
 13 FITZGERALD, KC:
 14 Q. Sure. So, then the obvious question then
 15 is, you know, why is Newfoundland Power’s
 16 operating expenses forecast to increase by
 17 substantially more?
 18 MR. CHUBBS:
 19 A. So, there’s a few things in our operating
 20 costs that are being affected by external
 21 market conditions, also things within the
 22 company that are outside of just general
 23 inflation. So, we look at all of our costs
 24 from an operating perspective. On a labour
 25 side, obviously we know where our – we have

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1 a better idea of where our labour costs are
 2 going. From a non-labour perspective,
 3 you're looking at GDP, you know, in areas
 4 where you see general inflation, but there
 5 are areas within the budget where there's
 6 specific things. So, you know, an example,
 7 2024 is our conversion to IFRS accounting
 8 standard, right. So, there's a single
 9 operating expense in there over the period
 10 of '24, '25 and '26 – I think I'm wrong, but
 11 – I got the year wrong on that one perhaps.
 12 But anyway, there's costs in there, like
 13 IFRS for a single year or single one-time
 14 increases. And then we're seeing cost
 15 pressures in technology as well. So, we're
 16 seeing incremental cost increases that are
 17 beyond GDP driven by external market trends
 18 in technology. So, software, licensing
 19 fees, things like that, cybersecurity that
 20 are driving increases beyond inflation. So,
 21 we use inflation where we don't have this
 22 kind of idea of where costs are going. But
 23 there are costs in here that are beyond
 24 inflationary increases.
 25 FITZGERALD, KC:

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1 Q. Yeah, I accept that, but you know, that's
 2 what you've spent the money on or that
 3 you've incurred those expenses, but you
 4 know, Newfoundland Power is within the
 5 overall Canadian economy, if you will, and
 6 there are other industries that would say
 7 the same thing, that you know, there's been
 8 inflationary pressures from different
 9 sectors. But still, when you wash it all
 10 out, it's – you know, it's 2.7 percent is
 11 the inflation rate. But for some reason,
 12 Newfoundland Power, who is subject to the
 13 same vagaries of the interest markets and
 14 all that as every other industry, but
 15 they're at seven percent. So, why such a –
 16 why is Newfoundland Power such an outlier?
 17 MR. CHUBBS:
 18 A. Well, I mean, first of all, first off, you
 19 know, our labour inflation is in here,
 20 right. So, our labour inflation is higher
 21 than GDP and our labour inflation is based
 22 off of negotiated contracts with our unions,
 23 collectively bargained contracts. So, they
 24 are not tied to general inflation that
 25 you're seeing. So, that's a contributing

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1 factor that's part of that. And as I said,
 2 you know, we have cost pressures that are
 3 beyond the level of inflation. So, when we
 4 see, for example, if you were to lock it to
 5 that GDP level and you see a significant
 6 increase, so you have to do, you know, this
 7 IFRS conversion which cost a million dollars
 8 in that year, you know, you can't go and
 9 pull that out of your operations and say,
 10 "well, I'm not going to serve my customers
 11 now. I'm not going to answer the phones or
 12 respond to trouble because I'm incurring
 13 this cost over here." You know, they are
 14 independent of the general inflation and
 15 these are real costs that we're seeing in
 16 operating our business.
 17 FITZGERALD, KC:
 18 Q. You mention the labour costs. When you
 19 negotiate with your union and a certain wage
 20 level is agreed upon, you know, for the
 21 following year or whatever the terms are,
 22 does management and, you know, the executive
 23 get a similar bump up? Like if the union
 24 gets five percent, does everybody get five
 25 percent in the organization?

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1 MR. CHUBBS:
 2 A. No, that's not how it works.
 3 FITZGERALD, KC:
 4 Q. Okay. So, there's no tie in of – so, for
 5 example, if there's a manager who's there
 6 who's non-union, if there's a union bump up-
 7 MR. CHUBBS:
 8 A. Yeah, thanks. Yeah, thanks for pointing
 9 that out because we do have – we do maintain
 10 a certain level of separation, you know,
 11 from say a trades to a supervisor, you know,
 12 and that's there and that's necessary to –
 13 you know, you want to maintain that gap.
 14 You want those supervisory roles to be
 15 filled, you know, preferably from those
 16 experienced folks from your union staff.
 17 So, you know, it's common practice to kind
 18 of keep that separation. So, it can
 19 translate to some managerial salaries
 20 directly, yes.
 21 FITZGERALD, KC:
 22 Q. Is there any effect on union wage increases
 23 on executive bonuses?
 24 MR. CHUBBS:
 25 A. You mean directly like if an increase is up

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1 four percent, the bonus is up four percent?
 2 Is that what you're -
 3 FITZGERALD, KC:
 4 Q. Yeah.
 5 MR. CHUBBS:
 6 A. No, no.
 7 FITZGERALD, KC:
 8 Q. If we go to the application itself, page
 9 1.3, and I'm looking at - scroll down,
 10 please. Page 1.3, and if you can scroll up
 11 a little bit. Okay, so line 11. "The
 12 company reduced its gross operating cost per
 13 customer by approximately 9.5 percent on an
 14 inflation adjusted basis over the last
 15 decade. The effective use of technology has
 16 been a primary means through which the
 17 company has improved its operating
 18 efficiency." So, subject to check, would
 19 you agree then over that ten-year period
 20 that's referenced there that that implies a
 21 0.9 percent productivity improvement each
 22 year?
 23 MR. CHUBBS:
 24 A. Yes, in terms of the reduction, yes.
 25 FITZGERALD, KC:

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1 Q. Okay. And has Newfoundland Power
 2 incorporated the 0.9 percent productivity
 3 improvement in its 2024 '25 and '26
 4 forecasts of operating expense?
 5 MR. CHUBBS:
 6 A. So, our - as I mentioned in my opening
 7 statement, when we look at what our known
 8 labour increase, our forecast labour
 9 increases are expected to be from that '22
 10 to '26 timeframe, that's 4.1 percent. So,
 11 that's - I'll say that's doing nothing, you
 12 know, just through regular labour inflation
 13 that we're seeing, you know, in the market
 14 and our collectively bargained contracts, we
 15 would see a 4.1 percent increase. But
 16 through the operating efficiencies that we
 17 have in our plan, the increase is 3.1
 18 percent. So, that's a difference of one
 19 percent on total operating labour, and that
 20 translates into about 1.5 million dollars in
 21 reduced operating labour costs over that
 22 period.
 23 FITZGERALD, KC:
 24 Q. The period I just spoke about?
 25 MR. CHUBBS:

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1 A. The period of '22 to '26.
 2 FITZGERALD, KC:
 3 Q. '26, okay. Can we go to page 227 of the
 4 application and it's Figure 2-11 and we
 5 discussed this with Ms. London, and - I'll
 6 wait for you to get there. Okay. So, this
 7 is the operating cost per customer 2013 to
 8 2022 and then the figure shows a dip in
 9 2021. Do you have any comment on that? Is
 10 there any explanation for that?
 11 MR. CHUBBS:
 12 A. Yeah, so there's a couple of things going on
 13 in there. I mean, Covid would be the most
 14 significant impact on our operating costs in
 15 that time. So, you know, we've all - I
 16 guess most of us have experienced the impact
 17 of Covid. We didn't - you know, it had
 18 large impact on our operations in terms of
 19 customers coming into our contact centre,
 20 you know, move-in/move-out requirements.
 21 University was effectively shutdown here.
 22 So, we weren't getting those same standard
 23 customer activities. We'd put a pause on
 24 disconnect for customers, you know,
 25 disconnect for debt through that period of

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1 time. So, you know, that had a pretty
 2 significant impact on our operations, and
 3 that's largely what you're seeing there.
 4 FITZGERALD, KC:
 5 Q. Thank you, and so, we look at in - you know,
 6 there was a dip in 2021, but it's been
 7 hovering since 2015 around \$260 per
 8 customer. Is Newfoundland Power committed
 9 to maintaining or reducing that number to
 10 the end of 2026?
 11 MR. CHUBBS:
 12 A. You know, our operating costs per customer
 13 up to 2026, you know, is relatively around
 14 that level. Again, driven by the effects of
 15 - well, obviously the inflationary impacts
 16 we spoke about, but also those known - other
 17 known increases, right. So, technology
 18 costs have been a significant driver for us.
 19 All these new software licensing agreements
 20 that are coming due, we're seeing market
 21 driven increases in technology costs. I
 22 mentioned insurance is another area that's
 23 been beyond inflation as well and you know,
 24 our other company fees. So, costs for
 25 consultants, costs for - you know, driven by

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1 regulation and things that are going on in
 2 the sector, right, which is in there as
 3 well. So, we're looking at levels that are
 4 in that range.
 5 FITZGERALD, KC:
 6 Q. Are you able to – you know, this cuts off in
 7 2022. As an undertaking, can you provide us
 8 an updated version of this chart to include
 9 2023, 2024, 2025 and 2026, based on the
 10 GRA's forecasts of operating costs and
 11 number of customers?
 12 (12:45 p.m.)
 13 MR. CHUBBS:
 14 A. That's actually on the record.
 15 FITZGERALD, KC:
 16 Q. Is it?
 17 MR. CHUBBS:
 18 A. NLH-NP-11, if you want to pull it up.
 19 FITZGERALD, KC:
 20 Q. Save you time. Okay, thank you. If you
 21 escalated the operating costs at the
 22 Canadian inflation rate and incorporated
 23 efficiency improvements, the ones you
 24 realized like, you know, the 0.9 percent to
 25 offset inflation increases, would you

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1 significantly reduce your operating costs in
 2 the 2026 test year?
 3 MR. CHUBBS:
 4 A. So, you know, these are the costs that
 5 Newfoundland Power forecasts are required to
 6 meet the needs of our customers in terms of
 7 meeting our customer service expectations,
 8 providing reliable service to customers, you
 9 know, keeping our employees safe and well-
 10 trained in there as well. They are based
 11 off of the best information Newfoundland
 12 Power has available. We have good
 13 understanding of where our labour forecasts
 14 are going. You know, in areas, in certain
 15 areas, you know, you're looking at an
 16 inflation adjustment where it's harder to
 17 predict where some costs may go. In other
 18 areas where we have a good sense of what are
 19 our costs are going to look like, like
 20 technology as well. So, we've built this
 21 forecast with the best available information
 22 we have. We've incorporated in here the
 23 known efficiencies that we've been able to
 24 achieve from – through our operations,
 25 largely through the use of operational

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1 technologies to make us more efficient, and
 2 that is built in here as well. So, this is
 3 the best forecast available in terms of what
 4 is needed to operate the system effectively
 5 for our customers at least cost.
 6 FITZGERALD, KC:
 7 Q. Okay. Just bear with me. Thank you, Mr.
 8 Chairman. Thank you, Mr. Chubbs. Those are
 9 all my questions.
 10 MR. CHUBBS:
 11 A. Thank you.
 12 CHAIRMAN:
 13 Q. Thank you, Mr. Fitzgerald. Mr. Simmons?
 14 SIMMONS, KC:
 15 Q. Yes, thank you, Mr. Chairman. Just – oh, we
 16 have a question from the witness?
 17 MR. CHUBBS:
 18 A. I drank a lot of water this morning.
 19 CHAIRMAN:
 20 Q. Five-minute break?
 21 SIMMONS, KC:
 22 Q. The secret is to sip it.
 23 MR. CHUBBS:
 24 A. Sip it, yeah.
 25 CHAIRMAN:

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1 Q. I was counting the bottles over there.
 2 MR. CHUBBS:
 3 A. Everyone's been counting them.
 4 CHAIRMAN:
 5 Q. We'll take a five-minute break.
 6 MR. CHUBBS:
 7 A. Thank you.
 8 (12:48 p.m. – BREAK)
 9 (12:55 p.m. – RESUME)
 10 CHAIRMAN:
 11 Q. Over to you, Mr. Simmons.
 12 MR. BYRON CHUBBS, CROSS-EXAMINATION BY DANIEL SIMMONS,
 13 KC
 14 SIMMONS, KC:
 15 Q. Thank you, Mr. Chairman. Mr. Chubbs, as you
 16 probably know, Dan Simmons for Hydro. Mr.
 17 Fitzgerald very conveniently left off at
 18 NLH-NP-11, which we can go back to please,
 19 and to Figure 1, because I've got two or
 20 three questions for you about that and
 21 that's all I'm going to ask you.
 22 MR. CHUBBS:
 23 A. Okay.
 24 SIMMONS, KC:
 25 Q. Depending on, of course, what your answers

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1 are. So, forewarned. So, this is – this
 2 Figure 1 shows the operating cost for
 3 customer from 2013 up to the 2026 forecast
 4 and these are inflation adjusted, correct?
 5 MR. CHUBBS:
 6 A. Yes, that’s correct.
 7 SIMMONS, KC:
 8 Q. Yes. And if you just go down to footnote
 9 number one, it says, “non-labour costs are
 10 inflation adjusted during the GDP deflator
 11 for Canada. Labour costs are inflation
 12 adjusted using Newfoundland Power’s labour
 13 inflation rates”. So, my first question
 14 concerns the non-labour costs at the GDP
 15 deflator. I understand that that could be
 16 used for costs up to the current time. For
 17 the forecasts in ’24, ’25 and ’26, do you
 18 know how the inflation rate is determined
 19 for use in making the inflationary
 20 adjustments for this chart? Is it the GDP
 21 inflator? Can you do that? Or do you have
 22 to estimate future inflation?
 23 MR. CHUBBS:
 24 A. We use the GDP inflator.
 25 SIMMONS, KC:

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1 Q. Okay. So, that’s your source. You follow
 2 it that way. Okay, good. Second question,
 3 and you may have already answered this. In
 4 2021, there was a dip, and if you look at
 5 2020 and 2022, the per capita cost per – the
 6 cost per customer seems to have been the
 7 same in 2020 and 2022 and that ’21, as the
 8 Covid year, would you regard that as an
 9 anomaly?
 10 MR. CHUBBS:
 11 A. Yes, when I look at – I had the same
 12 question when I saw this graph the first
 13 time and I thought what is this standout
 14 2021 dip, and I did have a look at, you
 15 know, how it’s calculated and we do use GDP
 16 when we’re doing these inflation adjusted
 17 graphs, so we’re not -- you know, for non-
 18 labour costs anyway.
 19 SIMMONS, KC:
 20 Q. Yeah.
 21 MR. CHUBBS:
 22 A. And you know, the costs in 2020 and 2021, in
 23 terms of dollars, were similar but that very
 24 high inflation rate that we saw over the
 25 period that was above our own forecast, and

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1 I think it’s – I think it’s something like
 2 seven, six or seven percent, maybe eight
 3 percent, that’s actually causing that to
 4 kind of offset. So, that’s one of the, I
 5 guess, drawbacks of just using GDP inflators
 6 because you don’t get that year-over-year
 7 kind of movement.
 8 SIMMONS, KC:
 9 Q. So, knowing that was tied to the Covid
 10 period and that it didn’t continue, would
 11 you accept that for the purpose of looking
 12 at trends, longer term trends in
 13 Newfoundland Power’s operating costs per
 14 customer, we should probably ignore that dip
 15 in 2021?
 16 MR. CHUBBS:
 17 A. Yeah, I think that’s reasonable, yes.
 18 SIMMONS, KC:
 19 Q. Okay. And then if you look at the line from
 20 let’s say 2014 down to 2018, there was a
 21 drop.
 22 MR. CHUBBS:
 23 A. Yes, that’s correct.
 24 SIMMONS, KC:
 25 Q. And if you then look from 2018 out to say

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1 the 2023 figure, actual figure, 2023 is
 2 actually a bit higher than 2018, isn’t it,
 3 per capita?
 4 MR. CHUBBS:
 5 A. Yes, that’s correct.
 6 SIMMONS, KC:
 7 Q. Right. And then if you look at the forecast
 8 from 2023 out to 2026 forecast, it’s a bit
 9 higher again, isn’t it?
 10 MR. CHUBBS:
 11 A. A little bit higher. Yes, that’s correct.
 12 SIMMONS, KC:
 13 Q. Right. So, when you look at lines 11 and
 14 12, Newfoundland Power’s operating costs per
 15 customer from 2013 to 2026 are forecast to
 16 reduce by 7.9 percent on an inflation
 17 adjusted basis. What actually happened is
 18 that all the reductions happened up to 2018.
 19 Actually since then, they’ve increased a bit
 20 and they’re projected to increase a bit more
 21 by 2026, right?
 22 MR. CHUBBS:
 23 A. Yes, we saw significant operating savings in
 24 that 2013 to 2017 timeframe, driven largely
 25 by our AMI or AMR conversion that we did,

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1 and that reduced two million dollars that
 2 removed two million dollars from our
 3 operating costs and another 1.8 with our LED
 4 streetlights. So, we're seeing some
 5 significant decreases. You know, we're in
 6 the period now where we're seeing some above
 7 average inflationary pressures on our non-
 8 labour costs, right.
 9 (1:00 p.m.)
 10 SIMMONS, KC:
 11 Q. Well, this is inflation adjusted.
 12 MR. CHUBBS:
 13 A. This is inflation adjusted using the GDP
 14 deflator, but there are pieces in there that
 15 are above inflation, you know, that's
 16 driving it. So, we use GDP inflation to –
 17 and applied it to all costs when we're
 18 looking at it from an historical
 19 perspective, but in reality, we are seeing
 20 above average inflationary pressures and
 21 costs that are beyond GDP, right, and that's
 22 one of the – I guess one of the limitations
 23 of this graph and this presentation. You're
 24 just applying general GDP to all your non-
 25 labour costs, right. So, that's part of

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1 what's going on there.
 2 SIMMONS, KC:
 3 Q. Okay. So, as far as the actual costs per
 4 customer goes, not to take away anything
 5 from Newfoundland Power's success up to
 6 2018, it's a correct observation though that
 7 since then, Newfoundland Power has not had
 8 any success in reducing per capita operating
 9 costs, for whatever reason, and that looking
 10 at the 2026, you're predicting that you're
 11 not going to have any success in reducing it
 12 in the future, correct?
 13 MR. CHUBBS:
 14 A. We've reduced our operating costs and our
 15 labour costs successfully over this period
 16 and we forecast further reductions in our
 17 labour cost, and that's largely driven by
 18 efficiencies that we've been able to find in
 19 our operations, and when you look at labour
 20 costs separately, those are certainly
 21 visible. The non-labour side is where it's
 22 a little – it's where we're seeing those
 23 above average inflationary pressures. I
 24 think what's really important to consider
 25 here is when you talk efficiency, you know,

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1 you're talking about can I do the same
 2 amount of work with less money or can I do
 3 more work with the same money, you know.
 4 And when I look at this graph, and I have
 5 the same thought as I'm looking at this, and
 6 I think of what we're – what we have going
 7 on in our operations today compared to 2016
 8 and 2017. You know, and again take – let's
 9 just put aside those large increases we're
 10 seeing in these, you know, insurance and
 11 technology costs. But you know, we have
 12 this aging system that we're dealing with,
 13 right. So, we're seeing more equipment
 14 failures today than we were five-ten years
 15 ago. That's a cost pressure in our
 16 operations. You know climate change. We're
 17 seeing more storms, more severe weather now,
 18 and we see that going forward and it's built
 19 into our forecast going forward, as we were
 20 in 2016/2017. We've got a younger
 21 workforce, right. So, our workforce today--
 22 30 percent of our workforce now is under
 23 five year's service. We've had a huge
 24 transition. Of the 600 or so employees we
 25 have, 200 of them we've hired in the last

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1 five years. So, that's--you know, your less
 2 experienced employees, it's driving training
 3 cost, right, and it certainly is hard to
 4 operate as efficiently without those 30/35
 5 year experienced employees that we've had.
 6 You know, from an environment perspective
 7 and sustainability, there's an increased
 8 focus on sustainability in our operations.
 9 So, you look at our environmental
 10 impacts. Our environmental impacts over the
 11 last decade were focused on spills and, you
 12 know, oil filled equipment, and PCB in oil
 13 filled equipment. Now we're measuring
 14 things like GHG emissions, you know, and
 15 we're talking biodiversity, and when we're
 16 putting forward, you know, environmental
 17 assessments to the Provincial Government,
 18 we're getting more requirements for our
 19 projects from an environmental perspective
 20 that we have to deal with, right. Those are
 21 new or growing costs, or cost pressures that
 22 we're seeing.
 23 If you think of cyber security, cyber
 24 security is a significant one. You know,
 25 five, 10, years ago cyber security was one

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1 guy in a cubicle at Newfoundland Power, our
 2 whole technology group, you know, and that
 3 was his role. That is its own department
 4 now, right. Cyber security threats are very
 5 real. We see it every day, and we have a
 6 team of people and they're implementing
 7 technologies and solutions to protect, you
 8 know, our system and our customer data from,
 9 you know, cyber threats, outside threats,
 10 and they are constantly, you know, probing
 11 our system trying to get in.
 12 You know, we talked about
 13 electrification, right, so electric
 14 vehicles, home heating conversions. Like
 15 those things are different types of low
 16 growth on our system that we're not really
 17 used to. You know, we're--low growth at
 18 Newfoundland Power was new home
 19 construction, new subdivision, things like
 20 that. Now we're seeing more consumption
 21 from customers. And, you know, we have
 22 folks who are spending time and effort
 23 trying to understand how are we going to
 24 deal with this type of growth in the future,
 25

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1 right. So, that's another cost pressure.
 2 And if I could add one more, like
 3 regulation. Regulation is a cost pressure
 4 at Newfoundland Power. Our capital budget
 5 intervention in the last few years has been
 6 higher than it's been historically, and that
 7 comes at a cost, right, for Newfoundland
 8 Power. So, those are all cost pressures
 9 that we see, and it's really new work
 10 requirements.
 11 So, when I look at this graph, I see
 12 Newfoundland Power doing a lot more with the
 13 same resources that we had 10 years ago, you
 14 know.
 15 SIMMONS, KC:
 16 Q. That was going to be my last question, and I
 17 wasn't expecting as long an answer as you
 18 just gave, and I take your answer to be
 19 that, yes, costs are forecast to increase in
 20 2026 over the 2023 actual year, which I
 21 think is what I--I think is what I've asked,
 22 and you've explained that rate payers are
 23 going to get more for their dollar so it's
 24 worthwhile. Is that the gist of what you're
 25

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1 saying? All these benefits you're talking
 2 about that they're going to receive make it
 3 worthwhile and Newfoundland Power therefore
 4 deserves to get paid more per capita for
 5 their operating expenses in order to deliver
 6 those benefits to the rate payers?
 7 MR. CHUBBS:
 8 A. I view the service that our customers
 9 receive as providing good value to our
 10 customers, and we survey our customers
 11 routinely. We've had consistent customer
 12 satisfaction levels over the last decade.
 13 That tells us that we're focused in the
 14 right areas, and the cost that we have put
 15 forward here, including the cost pressures
 16 that I've spoken about, are reasonable
 17 costs, and they're necessary costs, that we
 18 need to manage the system in a reliable
 19 manner, in an environmental responsible
 20 manner, and least cost manner for our
 21 customers.
 22 SIMMONS, KC:
 23 Q. And this is the last question. I had
 24 referred you before to lines 11 and 12, and
 25

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1 I think we've just established that
 2 operating costs per customer have not
 3 reduced since 2018, and are not projected to
 4 reduce since 2018. So, when in those lines
 5 you choose to say that from 2013 to 2026
 6 operating costs are forecast to reduce, when
 7 in fact they're not forecasted to reduce at
 8 all since 2018, would you agree with me that
 9 that could be a misleading statement?
 10 MR. CHUBBS:
 11 A. No, not at all. The question that Hydro
 12 posed to Newfoundland Power in this RFI
 13 asked us to provide an updated figure of
 14 2.11, and Figure 2.11 in our evidence is the
 15 operating cost per customer from 2013 to
 16 2022, I believe, and it had demonstrated
 17 there that our operating cost reduced by 9.5
 18 percent over that period, and we were asked
 19 to provide the updated graph extended out to
 20 2026, which is what we did, and we provided
 21 the updated operating cost per customer
 22 number that was a part of the original
 23 presentation. So, it seems to me like we've
 24 provided what was asked in the information
 25

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1 request.
 2 SIMMONS, KC:
 3 Q. Thank you very much. No further question,
 4 Mr. Chairman.
 5 CHAIR:
 6 Q. Thank you, Mr. Simmons. Over to Ms. Greene.
 7 Sorry, IBEW.
 8 MS. DING:
 9 Q. No questions, Mr. Chairman.
 10 CHAIR:
 11 Q. Sorry about that. Thanks. Over to Ms.
 12 Greene.
 13 MR. BYRON CHUBBS, CROSS-EXAMINATION BY MAUREEN GREENE,
 14 KC
 15 GREENE, KC:
 16 Q. Thank you, Mr. Chair. Good afternoon, Mr.
 17 Chubbs. I have a few general areas of
 18 questions that I wanted to review with you
 19 before we discuss operating costs, and I
 20 doubt we will finish the questions today.
 21 The first area I wanted to talk to you about
 22 is reliability, and you've already had some
 23 discussion with Mr. Fitzgerald this morning
 24 about that, and I am following up on some of
 25

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1 that discussion.
 2 First, could you explain how
 3 Newfoundland Power evaluates their
 4 performance for reliability? How do you do
 5 that?
 6 MR. CHUBBS:
 7 A. I look at reliability performance at
 8 Newfoundland Power using a lot of metrics,
 9 you know, and maybe I'll take an engineer's
 10 perspective. I look at it in terms of
 11 inputs and outputs into the system.
 12 So, first off, and I got into a bit of
 13 this this morning, on the input side, like
 14 what is Newfoundland Power doing to manage
 15 reliability, and that's those three areas
 16 that I spoke about in terms of building our
 17 system to the appropriate standards, and in
 18 maintaining our system, consistent with
 19 utility best practice, and then obviously
 20 responding effective to customer outages
 21 when they do occur. So, those are the three
 22 key inputs in my view in terms of how you
 23 manage reliability and how you evaluate it.
 24 Then on the output side you're looking
 25

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1 at your lagging data, what is the system
 2 telling you. So, we look at metrics like
 3 our SAIDI, our average duration of outages.
 4 We look at metrics like SAIFI, the frequency
 5 of outages, and I explained that, you know,
 6 this morning in terms of what that means.
 7 We compare that.
 8 When we evaluate those liability
 9 indices, we compare that to where we were
 10 historically as a company, you know, and we
 11 see that we've been fairly stable over the
 12 last decade, which is where we feel we're
 13 good. We evaluate it against peers. So, we
 14 evaluate our reliability against, you know,
 15 the CEA, Electricity Canada, Region 2
 16 numbers, and that kind of gives us some
 17 perspective of where we are in terms of
 18 overall reliability. So, that's the
 19 reliability numbers.
 20 Then there's customer satisfaction, you
 21 know. So, we survey our customers every
 22 quarter. We consistently get customer
 23 satisfaction levels that are, you know, that
 24 86 to 88 percent range, and we've been very
 25

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1 consistent over the last decade in achieving
 2 that. And when we ask our customers why you
 3 gave us this rating, the two things that are
 4 always--the top are cost and reliability.
 5 Those are the two, top two, all the time.
 6 So, that tells me that we're doing a good
 7 job of managing reliability.
 8 Then we look at cost. You know, that
 9 would be another, right. And, you know, we
 10 see our operational performance here, and
 11 operating cost per customer data. You can
 12 look at that a number of ways. There's some
 13 good data.
 14 GREENE, KC:
 15 Q. Can we leave operating cost per customer for
 16 now? We'll come back to that.
 17 MR. CHUBBS:
 18 A. Sure.
 19 GREENE, KC:
 20 Q. But you do look at that as one way of
 21 evaluating your performance.
 22 MR. CHUBBS:
 23 A. And another is--like there's a good RFI
 24 where we provide data on total T and D
 25

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1 investment in Atlantic Canada, right.

2 GREENE, KC:

3 Q. And we're going to come to that as well.

4 MR. CHUBBS:

5 A. Right. So, that's another area. So, when I

6 look at those and I compare how we're doing

7 historically, and how we're doing compared

8 to peers, that tells me we're doing a good

9 job of managing reliability. So, on the

10 inputs and outputs side I think Newfoundland

11 Power is doing a good job overall in

12 managing reliability to our customers.

13 GREENE, KC:

14 Q. You mentioned that you look at the lagging

15 indicators as one measure. What are the

16 metrics that you use there? Is it only

17 SAIDI and SAIFI?

18 MR. CHUBBS:

19 A. You know, for distribution, primarily a

20 distribution utility, which is--Newfoundland

21 Power, you know, a large part of our

22 operations is distribution. The single most

23 common metric for reliability is SAIDI,

24 right. We talk about SAIDI a lot, or SAIFI

25

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1 a lot here too as well, but really SAIFI is

2 a part of SAIDI. You know, it's that two

3 outages a year that our customers see, and

4 then when you add in our average response

5 time of 1.3, or multiple it in there, you

6 get that 2.6 overall number. So, SAIDI is

7 the key metric for Newfoundland Power. And

8 then you can--like I said, you can break

9 that out and look, okay, how are we doing on

10 frequency of outages, and how are we doing

11 on our operational response.

12 So, you can kind of--you can dive

13 deeper, and you can also dive deeper in

14 terms of major events, you know. So, we

15 factor our major events, and events that are

16 kind of beyond the design of your system,

17 but, you know, you can look at that data and

18 you can get information from that data as

19 well in terms of how you're responding to--

20 how resilient is your system, right? How do

21 you bounce back from these major storms and

22 things? So, we look at that data. And I

23 mentioned customer satisfaction is another--

24 and I also mentioned cost. So, those are

25

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1 the three.

2 GREENE, KC:

3 Q. And when you look at the SAIDI and SAIFI

4 metrics, those are the metrics that are used

5 by other Canadian electrical utilities to

6 compare performance, is that correct?

7 (1:15 p.m.)

8 MR. CHUBBS:

9 A. Yes, that's correct. Pretty much every

10 distribution utility that I'm aware of uses

11 SAIDI and SAIFI as key metrics.

12 GREENE, KC:

13 Q. And that data is readily available for

14 comparison purposes, is that correct?

15 MR. CHUBBS:

16 A. The data, it's on the record where

17 Newfoundland Power is compared to

18 Electricity Canada Region 2 average. The

19 data is not available separately. You know,

20 the data is reported, and the agreement with

21 Electricity Canada is that it can only be

22 used by other utilities in an aggregate

23 manner. So, that's how we go about -

24 GREENE, KC:

25

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1 Q. I think it would be helpful if we brought up

2 to see the Figure 2.5 in the application on

3 page 2-17. And these are the measures you

4 report routinely to the Board to allow the

5 Board to also evaluate how Newfoundland

6 Power is performing from a reliability

7 perspective, is that correct?

8 MR. CHUBBS:

9 A. This Board you mean?

10 GREENE, KC:

11 Q. Yes.

12 MR. CHUBBS:

13 A. Yes.

14 GREENE, KC:

15 Q. So, here we see SAIFI under normal operating

16 conditions, and normal operating conditions

17 means excluding unusual events and loss of

18 supply from Hydro, is that correct?

19 MR. CHUBBS:

20 A. Yes, that's correct.

21 GREENE, KC:

22 Q. So, SAIFI is also--for the frequency of

23 outages, that is also where you are broadly

24 consistent with the Canadian average, is

25

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1 that correct?
 2 MR. CHUBBS:
 3 A. Yes, that's correct.
 4 GREENE, KC:
 5 Q. And that's what we see if we look there.
 6 Actually, if we go to Figure 2.7, and her we
 7 can see--because it's always a picture says
 8 a thousand words sometimes, that it is
 9 broadly consistent with the Canadian
 10 average. Is that what we should take from
 11 Figure 2.7?
 12 MR. CHUBBS:
 13 A. Yes, that's correct.
 14 GREENE, KC:
 15 Q. Now, the other measure that's used by all
 16 utilities for reporting on their performance
 17 is SAIDI. So, here if we could go, please,
 18 to Figure 2.6. Again, we see SAIDI under
 19 normal operating conditions, and we see that
 20 there was an improvement from 2014 down to--
 21 a little blip in 2018, and then 2020. So,
 22 in 2013/2014, are we seeing there some of
 23 the impacts of what is anecdotally referred
 24 to as DarkNL?
 25

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1 MR. CHUBBS:
 2 A. No. So, DarkNL would be considered a major
 3 event for Newfoundland Power, so it is
 4 excluded from this data. I think there is a
 5 graph in the evidence that shows, if you
 6 want to pull it up, but it does exclude Dark
 7 NL.
 8 GREENE, KC:
 9 Q. The next one is how we compare to the
 10 Canadian average, which is Figure 2.8. And
 11 this is where we see that Newfoundland Power
 12 is performing 40 percent better than the
 13 Canadian Electricity Canada Region 2.
 14 Perhaps you could explain what Region 2
 15 utilities are.
 16 MR. CHUBBS:
 17 A. Yes, I can. I think the utilities are
 18 actually included if you go back to page--
 19 footnote 35 on page 2-19. That actually
 20 lists the utilities that identify as Region
 21 2. And Region 2 utilities are utilities
 22 that have a mix of urban and rural
 23 customers, right. So, you know, a utility
 24 like Toronto Hydro, for example, wouldn't be
 25

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1 a Region 2 utility because it's all urban, a
 2 lot of underground infrastructure, and their
 3 crews are generally closer to where trouble
 4 occurs. And you'd see some very rural
 5 utilities that wouldn't be included here
 6 either because they're for--you know, the
 7 response time is so much longer. So,
 8 Electricity Canada provides these different
 9 regions of utilities. So, it's not
 10 geographical region, it's based on the
 11 customer mix.
 12 GREENE, KC:
 13 Q. And these are the utilities that you would
 14 consider to be your peers for evaluating
 15 reliability performance, is that correct?
 16 MR. CHUBBS:
 17 A. These utilities would be the most comparable
 18 to Newfoundland Power in terms of their
 19 customer mix, yes.
 20 GREENE, KC:
 21 Q. Is there any other readily available source
 22 of data that would allow a comparison of
 23 your performance versus other utilities?
 24 For example, we see that there are--you can
 25

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1 see that Newfoundland Power's performance
 2 versus other Canadian utilities from a
 3 reliability perspective because that data is
 4 available for what was the old Canadian
 5 Electricity Association, but there's no
 6 similar data available for operating cost
 7 per customer, is there, for Canada?
 8 MR. CHUBBS:
 9 A. No, that's correct. There's--we haven't
 10 been able to source a comparable peer group
 11 for Canada because it's not something that's
 12 recorded and reported on. That's why we use
 13 the US comparison peer group for our
 14 operating cost per customer.
 15 GREENE, KC:
 16 Q. I would like now to go to the RFI you
 17 referred to, which is PUB-NP-046, which is
 18 where we see another comparison of the cost
 19 of Newfoundland Power per transmission and
 20 distribution, but it is capital, not
 21 operating, but we see a comparison of
 22 Newfoundland Power's cost on the capital
 23 side compared to other Atlantic Canadian
 24 utilities. So, this goes to the question of
 25

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1 the cost being paid for reliability which
 2 was discussed with you earlier today, and
 3 whether there's additional cost being
 4 incurred. If we look at Table 1, we do see
 5 that the capital investment cost for the
 6 period again 2013 to 2022 has been lower
 7 than the other Canadian Atlantic utilities,
 8 and also the capital investment per
 9 customer. I wanted you to explain how we
 10 should interpret that data and what should
 11 we take from this table?
 12 MR. CHUBBS:
 13 A. I think what can be taken from this table
 14 and, you know, it's worth pointing out that
 15 it is really difficult to compare utility to
 16 utility. Every utility is different in
 17 terms of storms, in terms of, you know,
 18 geography, you know, just historical growth
 19 of the system, you know, when things became
 20 electrified and rebuilt, and all that. So,
 21 it's always a challenge to go utility to
 22 utility, but what this table tells me is
 23 that our level of investment in our
 24 electricity system is reasonable when we
 25

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1 compare that to the rest of Atlantic Canada.
 2 GREENE, KC:
 3 Q. And when you looked at, or discussed
 4 earlier, that how you look at the balance of
 5 the cost, one is the design standard that
 6 must be maintained. So, that design
 7 standard in what Newfoundland Power builds
 8 would be captured in these numbers, is that
 9 correct?
 10 MR. CHUBBS:
 11 A. Yes, that's correct. We've been building to
 12 the current design standards. So, the shift
 13 in electricity, or the Canadian Standards
 14 Association, to severe weather loading for
 15 Newfoundland and Labrador occurred in early
 16 2000's. So, throughout this period here you
 17 would see all this investment that occurred
 18 over that period, from 2013 to '22, would be
 19 built to the current--current standard.
 20 GREENE, KC:
 21 Q. And we've already established that there's
 22 no comparable data available to compare your
 23 operating cost per customer to others, is
 24 that correct, and Canada.
 25

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1 MR. CHUBBS:
 2 A. In Canada, that's correct. For Canada we do
 3 have a US peer group that we use.
 4 GREENE, KC:
 5 Q. I had intended to ask you how did balance
 6 cost from capital and operating perspectives
 7 with respect to reliability and what's
 8 required. Now, Mr. Fitzgerald did take you
 9 through that, and I was just going to give
 10 you the opportunity if there's anything else
 11 you wanted to add without repeating some of
 12 the answers to the questions. How does
 13 Newfoundland Power balance the issue of the
 14 cost to customers versus the reliability
 15 that is required to supply customers
 16 adequately?
 17 MR. CHUBBS:
 18 A. I think the key message there is that in
 19 Newfoundland Power's view, and from our
 20 operational experience, that a reliable
 21 system is an efficient system. And if
 22 you're managing your system in a manner that
 23 gets the maximum life out of your assets,
 24 and you're inspecting it in a way that you
 25

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1 are replacing assets prior to failure as
 2 best you can, we can't always do that, that
 3 that is the least cost way to maintaining
 4 your electricity grid that provides good
 5 reliability outcomes for customers and does
 6 so at the lowest possible cost.
 7 GREENE, KC:
 8 Q. You also earlier talked about a review that
 9 had been done by Liberty in response to
 10 DarkNL, which reviewed one of the other
 11 factors that you say are important, which is
 12 the maintenance of the system. Have there
 13 been other reviews done as well, and if so,
 14 when? Do you recall?
 15 MR. CHUBBS:
 16 A. We haven't done any reviews on the
 17 maintenance of the system since the Liberty
 18 review, other than the fact that we are now
 19 going through a review of our approach to
 20 asset management for reasons that I
 21 mentioned earlier, right.
 22 GREENE, KC:
 23 Q. Prior to Liberty, were there reviews
 24 undertaken at the direction of the Board
 25

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1 with respect to Newfoundland Power's
 2 performance from a reliability and cost
 3 perspective, an operational review?
 4 MR. CHUBBS:
 5 A. The last review that I was aware of prior to
 6 Liberty, and this is before my time at
 7 Newfoundland Power, so I may get some
 8 details wrong, but effectively Newfoundland
 9 Power's reliability performance was not
 10 great in the mid to late '90's, and because
 11 of that, the Utilities Board saw fit to
 12 complete a review of Newfoundland Power's
 13 liability performance, and the result of
 14 that review was a recommendation that
 15 Newfoundland Power should seek to improve
 16 the overall reliability that we provide to
 17 our customers. And following that review,
 18 that was when, as I mentioned earlier, in
 19 the early 2000's where we changed our
 20 approach to asset management. That's when
 21 we implemented our current asset management
 22 technology, where we developed our asset
 23 management strategies for our generation
 24 substation transmission and distribution
 25

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1 systems, incorporated more preventative
 2 maintenance. So, we were doing more work on
 3 a plan fashion driven by inspections and not
 4 responding to trouble. And in the 10 or so
 5 years following, so from that year say 2000
 6 to 2010, we saw an overall improvement to
 7 reliability that our customers received,
 8 while at the same time our operating cost
 9 per customer actually came down, right. So,
 10 that is what supports our view that a
 11 reliable system is an efficient system.
 12 GREENE, KC:
 13 Q. So, there have been two operational reviews
 14 of hydro that were directed by the Board,
 15 one was around 2000, or a little bit
 16 earlier, and another in 2014. Do you think
 17 those types of periodic operational reviews
 18 are helpful to be able to explain to
 19 customers and also for Newfoundland Power to
 20 look at how they're balancing cost and
 21 reliability?
 22 MR. CHUBBS:
 23 A. I would consider the outcomes that customers
 24 are receiving as a key indicator of whether
 25

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1 a review of reliability was necessary. You
 2 mentioned, or I mentioned, Newfoundland
 3 Power in the late '90's. You mentioned
 4 Newfoundland and Labrador Hydro in 2014
 5 following DarkNL. So, both of those
 6 situations were times when it didn't appear
 7 the level of reliability customers were
 8 experiencing was appropriate. And at that
 9 time, in those times, it made sense to
 10 complete a review. When I look at
 11 Newfoundland Power right now, our
 12 reliability that we've provided to our
 13 customers over the last decade has been very
 14 consistent, and our customer satisfaction
 15 levels when we survey our customers has been
 16 very consistent over that decade. So, that
 17 tells me that we're getting it right.
 18 GREENE, KC:
 19 Q. Mr. Chair, it's 1:30.
 20 CHAIR:
 21 Q. Okay. We'll adjourn for the day. Thank
 22 you.
 23 MS. GLYNN:
 24 Q. Mr. Chair, before we go, just to, I guess,
 25

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1 plan for tomorrow, we will finish with Mr.
 2 Chubbs and we will start with Mr. Comerford.
 3 If anybody has any comments on that I guess
 4 we can address that now as opposed to -
 5 MR. O'BRIEN:
 6 Q. I'm just wondering how long we might be
 7 with--I guess my question is more along the
 8 lines of are we going to get to Mr. Bowman
 9 rather than sort of--or are we going to wait
 10 until Friday, and if that's fine, I'm okay
 11 with that, but I'm just asking the question.
 12 GREENE, KC:
 13 Q. I will be a significant period with Mr.
 14 Chubbs -
 15 MR. O'BRIEN:
 16 Q. Okay. Well, it would make sense that -
 17 GREENE, KC:
 18 Q. - but it won't be past the break.
 19 MR. O'BRIEN:
 20 Q. No, no, but it would make sense then that
 21 we're not going to get to Mr. Bowman.
 22 MS. GLYNN:
 23 Q. I think Mr.--finish Mr. Chubbs and Mr.
 24 Comerford might be our -
 25

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1 MR. O'BRIEN:
 2 Q. And that's all I was wondering.
 3 MS. GLYNN:
 4 Q. Our only plan for tomorrow.
 5 MR. O'BRIEN:
 6 Q. Okay.
 7 CHAIR:
 8 Q. It is difficult to predict. We can ask the
 9 questions but we have no idea how long the
 10 answer is going to take.
 11 MR. O'BRIEN:
 12 Q. That's a dig at you, Mr. Chubbs.
 13 CHAIR:
 14 Q. That's what's relevant.
 15 MR. O'BRIEN:
 16 Q. And, Mr. Browne, you had your own witness
 17 like that.
 18 BROWNE, KC:
 19 Q. If the shoe fits.
 20 MS. GLYNN:
 21 Q. The long and the short is the probability of
 22 getting to Mr. Bowman is very low tomorrow.
 23 CHAIR:
 24 Q. Thank you, everyone.
 25

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CERTIFICATE

I, Judy Moss, hereby certify that the foregoing is a true and correct transcript of hearing in the matter of Newfoundland Power Inc. 2025-2026 General Rate Application heard on June 26th, 2024 before the Newfoundland and Labrador Board of Commissioners of Public Utilities, 120 Torbay Road, St. John's, Newfoundland and Labrador and was transcribed by me to the best of my ability by means of a sound apparatus.

Dated at St. John's, Newfoundland and Labrador this 26th day of June, 2024

Judy Moss

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1 Upon conclusion at 1:31 p.m.
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