

WHENEVER. WHEREVER.
We'll be there.



February 20, 2025

Board of Commissioners
of Public Utilities
P.O. Box 21040
120 Torbay Road
St. John's, NL A1A 5B2

Attention: Jo-Anne Galarneau
Executive Director and Board Secretary

Dear Ms. Galarneau:

Re: Application for Approval of Balance in Weather Normalization Reserve

Please find enclosed Newfoundland Power Inc.'s (the "Company") application for approval of the balance in the Weather Normalization Reserve (the "Reserve") as of December 31, 2024. Schedule A to the Application, *Weather Normalization Reserve: Calculation of 2024 Balance*, shows the operation of the Reserve for the period January 1, 2024 to December 31, 2024, including the year-end balance.

The Reserve includes both degree day normalization and hydro production equalization. Degree day normalization adjusts revenue and purchased power expense for the impact of abnormal degree days and wind speed. Hydro production equalization adjusts purchased power expense for the impact on natural stream flows caused by variations in precipitation.

The balance in the Reserve as of December 31, 2024 is a credit balance of approximately \$2.9 million, which reflects an amount owing from the Company to customers. In accordance with the Rate Stabilization Clause, this amount will be credited to the Rate Stabilization Account balance as of March 31, 2025.

If you have any questions on the enclosed, please contact the undersigned.

Newfoundland Power Inc.

55 Kenmount Road • P.O. Box 8910 • St. John's, NL A1B 3P6

PHONE (709) 853-6251 • FAX (709) 737-2974 • sdonovan@newfoundlandpower.com

Board of Commissioners
of Public Utilities
February 20, 2025
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Yours truly,



Siobhan Donovan
Manager, Regulatory Affairs

Enclosures

cc. Shirley Walsh
Newfoundland and Labrador Hydro

Dennis Browne, K.C.
Browne Fitzgerald Morgan & Avis

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IN THE MATTER OF the Electrical Power Control Act, 1994, SNL 1994, Chapter E-5.1 (the “EPCA”) and the **Public Utilities Act**, RSNL 1990, Chapter P-47 (the “Act”), as amended, and regulations thereunder; and

IN THE MATTER OF an application by Newfoundland Power Inc. for approval of the balance in the Weather Normalization Reserve as of December 31, 2024 pursuant to sections 69(3) and 78 of the Act.

TO: The Board of Commissioners of Public Utilities (the “Board”)

THE APPLICATION OF Newfoundland Power SAYS:

A. Background

1. Newfoundland Power Inc., a corporation duly organized and existing under the laws of the Province of Newfoundland and Labrador, is a public utility within the meaning of the Act and is subject to the provisions of the *Electrical Power Control Act, 1994*.
2. By Order No. P.U. 32 (1968), the Board ordered, in effect, that Newfoundland Power maintain a reserve to which it must credit or debit the value of energy generated by its hydro plants in years when total precipitation is above or below average (“hydro production equalization”).
3. By Order No. P.U. 1 (1974), the Board ordered, in effect, that Newfoundland Power maintain a reserve to normalize its revenue and power purchases to reflect the effects of abnormal weather. The Board subsequently approved the inclusion of adjustments for cooling degree days in June 1985 and wind speed in March 1995 (collectively, “degree day normalization”). The Board further ordered in Order No. P.U. 1 (1974) that Newfoundland Power combine degree day normalization with the hydro production equalization in a single reserve (the “Weather Normalization Reserve”).
4. By Order No. P.U. 13 (2013), the Board ordered, in effect, that Newfoundland Power’s Rate Stabilization Clause provide that, on March 31st of each year, the Rate Stabilization Account shall be increased (or reduced) by the balance in the Weather Normalization Reserve accrued in the previous year.

B. 2024 Weather Normalization Reserve Transfer

5. Schedule A to this Application, *Weather Normalization Reserve: Calculation of 2024 Balance*, shows (i) the calculated balance in the Weather Normalization Reserve at December 31, 2024 and (ii) a summary of the debit and credit transfers to Weather Normalization Reserve by virtue of hydro production equalization and degree day normalization during 2024.
6. The net credit transfer to the Weather Normalization Reserve for 2024, which reflects the combined effect of hydro production equalization and degree day normalization, as shown in Schedule A to this Application, was \$4,136,854 before related income tax effects.
7. The net effect of the 2024 transfers after related income tax effects is a credit balance in the Weather Normalization Reserve as of December 31, 2024 in the amount of \$2,895,798. This represents a balance owing from Newfoundland Power to customers.

C. Procedural Matters

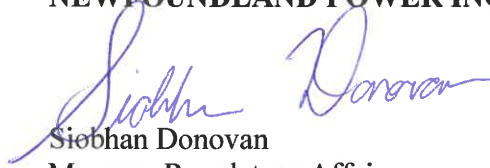
8. Schedule A to this Application properly reflects the effect that hydro production equalization and degree day normalization have had on Newfoundland Power's operations, and all adjustments and transfers have been made in accordance with Board orders and approvals relating to the Weather Normalization Reserve.
9. As the transfers summarized in Schedule A to this Application are made in accordance with Board orders and approvals, Newfoundland Power submits that public notice and hearing into this Application is not necessary for the protection of the public interest.
10. Communications with respect to this Application should be forwarded to the attention of Siobhan Donovan, Manager Regulatory Affairs at Newfoundland Power.

D. Order Requested

11. Newfoundland Power requests that the Board make an order approving, pursuant to Sections 69(3) and 78 of the Act, a credit balance in the Weather Normalization Reserve of \$2,895,798 after related income tax effects as of December 31, 2024.

DATED at St. John's, Newfoundland and Labrador, this 20th day of February, 2025.

NEWFOUNDLAND POWER INC.



Siobhan Donovan
Manager Regulatory Affairs
Newfoundland Power Inc.
P.O. Box 8910
55 Kenmount Road
St. John's, NL A1B 3P6

Telephone: (709) 853-6251
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IN THE MATTER OF the Electrical Power Control Act, 1994, SNL 1994, Chapter E-5.1 (the “EPCA”) and the Public Utilities Act, RSNL 1990, Chapter P-47 (the “Act”), as amended, and regulations thereunder; and

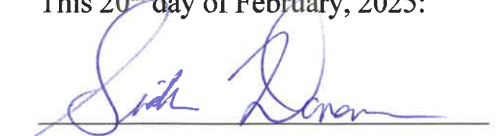
IN THE MATTER OF an application by Newfoundland Power Inc. for approval of the balance in the Weather Normalization Reserve as of December 31, 2024 pursuant to sections 69(3) and 78 of the Act.

AFFIDAVIT

I, Brian Menchenton, of the City of St. John’s in the Province of Newfoundland and Labrador, professional accountant, make oath and say as follows:

1. That I am Director, Business and Regulatory Affairs of Newfoundland Power Inc.
2. That I have read and understand the foregoing application.
3. To the best of my knowledge, information and belief, all matters, facts and things set out in the Application are true.

SWORN TO, at City of St. John’s in the Province of Newfoundland and Labrador
This 20th day of February, 2025:


Barrister – Newfoundland & Labrador


Brian Menchenton

**Weather Normalization Reserve:
Calculation of 2024 Balance**

February 2025

A. 2024 Weather Normalization Reserve Balance

Appendix A to this Report shows a summary of the debit and credit transfers to the Weather Normalization Reserve to reflect both degree day normalization and hydro production equalization during 2024. In addition, Appendix A shows the calculation of the credit balance of \$2,895,798 in the Weather Normalization Reserve as at December 31, 2024. This amount represents the total transfers to the reserve in 2024 of \$4,136,854 reduced by the related income tax effects of \$1,241,056.¹

B. Degree Day Normalization Calculations

For each weather sensitive rate class, and each of Newfoundland Power's eight operating areas, the number of units of abnormal weather is multiplied by the corresponding coefficient for each applicable weather variable to determine the resulting adjustments to kilowatt-hour sales and kilowatt-hour purchases for each month.

Appendix B to this Report shows the annual kilowatt-hour sales adjustments for each of Newfoundland Power's areas with the corresponding revenue adjustments. The rates used in deriving revenue adjustments are base rates which exclude the rate stabilization and municipal tax adjustments. The revenue adjustments for 2024 were derived from the base rates used in calculating the final rates charged to customers from January 1, 2024 to December 31, 2024.

Appendix C to this Report shows the annual kilowatt-hour purchases adjustments by area and the corresponding purchased power expense adjustments. The purchased power rate used in deriving the expense adjustments for January 1, 2024 to December 31, 2024 was 181.65 mills per kilowatt-hour (i.e., 18.165¢ per kWh). This represents the excess energy block tariff of the wholesale rate excluding the RSP adjustment charged to Newfoundland Power by Newfoundland and Labrador Hydro, approved in Order No. P.U. 30 (2019).

The total of the revenue adjustments shown in Appendix B, less the total of the purchased power expense adjustments shown in Appendix C, net of income tax, is debited or credited to the Weather Normalization Reserve.

The actual degree days and wind speed adjustments used in the Appendices to this Report have been taken from data supplied by the Government of Canada. The weather coefficients used in calculating monthly adjustments for the degree day normalization were derived using the methodology approved by the Board on March 29, 1995.

C. Hydro Production Equalization Calculations

Appendix D shows, on a monthly basis, the average natural stream flows, the actual natural stream flows, and the variation between the two. The monthly variation in thousands of kilowatt-hours (megawatt-hours) is multiplied by the purchased power rate of 181.65 mills per kilowatt-

¹ Transfers to the Weather Normalization Reserve in 2024: $\$5,595,183 + (\$9,732,037) = (\$4,136,854)$. Related income tax effects: $\$1,678,555 + (\$2,919,611) = (\$1,241,056)$. Final balance in the Weather Normalization Reserve for 2024: $(\$4,136,854) - (\$1,241,056) = (\$2,895,798)$.

hour (i.e., 18.165¢ per kWh) for January 1, 2024 to December 31, 2024. The product of those calculations is then added by month to determine the annual purchased power expense adjustment.

The data used in the calculation of the hydro production equalization transfer was taken from measurements and readings made by employees of Newfoundland Power. The average annual natural stream flows (production) effective January 1, 2024 are those provided by Newfoundland Power to the Board on February 2, 2024.

The purchased power expense adjustment related to variations in stream flows shown in Appendix D, net of income tax, is debited or credited to the Weather Normalization Reserve.

Newfoundland Power Inc. Weather Normalization Reserve January 1 - December 31, 2024		
<u>Degree Day Normalization Reserve</u>		
Revenue Adjustment		
Heating Degree Days	Appendix "B", Page 1 of 3	13,690,422.84
Cooling Degree Days	Appendix "B", Page 2 of 3	-
Wind Speed Adjustments	Appendix "B", Page 3 of 3	<u>-</u>
Total Revenue Adjustment		<u>13,690,422.84</u>
Less : Purchased Power Adjustment		
Heating Degree Days	Appendix "C", Page 1 of 3	23,422,460.52
Cooling Degree Days	Appendix "C", Page 2 of 3	-
Wind Speed Adjustments	Appendix "C", Page 3 of 3	<u>-</u>
Total Purchased Power Adjustment		<u>23,422,460.52</u>
Net Adjustment (Before Tax)		(9,732,037.68)
Less: Income Tax @ 30.0%		(2,919,611.30)
Net Debit (Credit) Transfer		<u><u>(6,812,426.38)</u></u>
<u>Hydro Production Equalization Reserve</u>		
Debit (Credit) Transfer (Before Tax)	Appendix "D", Page 1 of 1	5,595,183.30
Less: Income Tax @ 30.0%	Appendix "D", Page 1 of 1	<u>1,678,554.99</u>
Net Debit (Credit) Transfer	Appendix "D", Page 1 of 1	<u><u>3,916,628.31</u></u>
Net Debit (Credit) Transfer to the Weather Normalization Reserve		<u><u>(2,895,798.07)</u></u>
Balance of Reserve - December 31, 2023		\$ 6,321,270.07
Transfer of 2023 Balance to RSA		(6,321,270.07)
Net Debit (Credit) Transfer		<u>(2,895,798.07)</u>
Balance of Reserve - December 31, 2024		<u>\$ (2,895,798.07)</u>

Newfoundland Power Inc.
Sales Normalization Adjustment - Heating Degree Days
January 1 - December 31, 2024

Rate Code	Rate Classification	St. John's	Avalon	Burin	Bonavista	Gander	Grand Falls	Corner Brook	Stephenville	Company Total	Revenue Adjustment
110.00	Domestic	4,098,625	2,040,879	842,681	1,255,421	1,605,636	2,457,299	1,894,637	1,038,644	15,233,822	\$ 1,788,146.02
112.00	Domestic EH	42,589,094	9,889,779	3,626,777	4,987,887	5,636,691	7,755,516	6,972,481	3,979,348	85,437,573	10,028,662.32
158.00	Domestic Reg - Seasonal Op	-	-	-	-	-	-	-	-	-	-
159.00	Domestic EH - Seasonal Op	-	-	-	-	-	-	-	-	-	-
210.00	General Service 0 - 10 kW	-	-	-	-	39,910	58,167	45,912	-	143,989	12,551.52
211.00	General Service 0 - 10 kW EH	369,562	122,332	57,100	125,675	53,510	113,381	83,668	-	925,228	80,652.13
212.00	General Service 0 - 10 kW EH	-	-	-	-	-	-	-	-	-	-
213.00	General Service 0 - 10 kW EH	-	-	-	-	-	-	-	-	-	-
220.00	General Service 10 - 100 kW	1,015,576	322,691	130,489	171,275	249,275	343,368	223,308	186,261	2,642,243	230,324.32
221.00	General Service 10 - 100 kW EH	5,271,706	1,022,303	-	741,206	703,565	1,165,868	865,076	516,453	10,286,177	896,646.04
222.00	General Service 10 - 100 kW EH	-	-	-	-	-	-	-	-	-	-
223.00	General Service 10 - 100 kW EH	-	-	-	-	-	-	-	-	-	-
230.00	General Service 110 - 350 kVA	-	-	-	-	-	-	-	-	-	-
231.00	General Service 110 - 350 kVA EH	3,636,481	-	-	251,298	-	888,503	-	-	4,776,282	380,239.80
232.00	General Service 110 - 350 kVA EH	-	-	-	-	-	-	-	-	-	-
233.00	General Service 110 - 350 kVA EH	-	-	-	-	-	-	-	-	-	-
234.00	General Service 350 - 1000 kVA	-	-	-	-	-	-	-	-	-	-
235.00	General Service 350 - 1000 kVA EH	2,908,765	-	-	-	-	-	-	-	2,908,765	231,566.78
236.00	General Service 350 - 1000 kVA EH	-	-	-	-	-	-	-	-	-	-
237.00	General Service 350 - 1000 kVA EH	-	-	-	-	-	-	-	-	-	-
240.00	General Service over 1000 kVA	-	-	-	-	-	-	-	-	-	-
241.00	General Service over 1000 kVA EH	528,148	-	-	-	-	-	-	-	528,148	41,633.91
242.00	General Service over 1000 kVA EH	-	-	-	-	-	-	-	-	-	-
243.00	General Service over 1000 kVA EH	-	-	-	-	-	-	-	-	-	-
410.00	Area Lighting	-	-	-	-	-	-	-	-	-	-
		<u>60,417,957</u>	<u>13,397,984</u>	<u>4,657,047</u>	<u>7,532,762</u>	<u>8,288,587</u>	<u>12,782,102</u>	<u>10,085,082</u>	<u>5,720,706</u>	<u>122,882,227</u>	<u>\$ 13,690,422.84</u>

Newfoundland Power Inc. Purchased Power Normalization Adjustment - Heating Degree Days January 1 - December 31, 2024											
Rate Code	Rate Classification	St. John's	Avalon	Burin	Bonavista	Gander	Grand Falls	Corner Brook	Stephenville	Total Company	Purchased Power Adjustment
110.00	Domestic	4,300,542	2,141,554	884,190	1,317,378	1,684,874	2,578,324	1,987,989	1,089,908	15,984,759	\$ 2,903,631.49
112.00	Domestic EH	44,690,617	10,377,228	3,805,549	5,233,916	5,914,569	8,137,964	7,316,330	4,175,589	89,651,762	16,285,242.57
158.00	Domestic Reg - Seasonal Op	-	-	-	-	-	-	-	-	-	-
159.00	Domestic EH - Seasonal Op	-	-	-	-	-	-	-	-	-	-
210.00	General Service 0 - 10 kW	-	-	-	-	41,882	61,027	48,176	-	151,085	27,444.59
211.00	General Service 0 - 10 kW EH	387,813	128,362	59,917	131,875	56,144	118,983	87,801	-	970,895	176,363.07
212.00	General Service 0 - 10 kW EH	-	-	-	-	-	-	-	-	-	-
213.00	General Service 0 - 10 kW EH	-	-	-	-	-	-	-	-	-	-
220.00	General Service 10 - 100 kW	1,065,672	338,600	136,923	179,722	261,567	360,305	234,318	195,440	2,772,547	503,633.16
221.00	General Service 10 - 100 kW EH	5,531,742	1,072,718	-	777,762	738,266	1,223,352	907,741	541,923	10,793,504	1,960,639.99
222.00	General Service 10 - 100 kW EH	-	-	-	-	-	-	-	-	-	-
223.00	General Service 10 - 100 kW EH	-	-	-	-	-	-	-	-	-	-
230.00	General Service 110 - 350 kVA	-	-	-	-	-	-	-	-	-	-
231.00	General Service 110 - 350 kVA EH	3,815,827	-	-	263,691	-	932,322	-	-	5,011,840	910,400.73
232.00	General Service 110 - 350 kVA EH	-	-	-	-	-	-	-	-	-	-
233.00	General Service 110 - 350 kVA EH	-	-	-	-	-	-	-	-	-	-
234.00	General Service 350 - 1000 kVA	-	-	-	-	-	-	-	-	-	-
235.00	General Service 350 - 1000 kVA EH	3,052,218	-	-	-	-	-	-	-	3,052,218	554,435.40
236.00	General Service 350 - 1000 kVA EH	-	-	-	-	-	-	-	-	-	-
237.00	General Service 350 - 1000 kVA EH	-	-	-	-	-	-	-	-	-	-
240.00	General Service over 1000 kVA	-	-	-	-	-	-	-	-	-	-
241.00	General Service over 1000 kVA EH	554,195	-	-	-	-	-	-	-	554,195	100,669.52
242.00	General Service over 1000 kVA EH	-	-	-	-	-	-	-	-	-	-
243.00	General Service over 1000 kVA EH	-	-	-	-	-	-	-	-	-	-
410.00	Area Lighting	-	-	-	-	-	-	-	-	-	-
		<u>63,398,626</u>	<u>14,058,462</u>	<u>4,886,579</u>	<u>7,904,344</u>	<u>8,697,302</u>	<u>13,412,277</u>	<u>10,582,355</u>	<u>6,002,860</u>	<u>128,942,805</u>	<u>\$ 23,422,460.52</u>

Newfoundland Power Inc. Hydro Production Equalization Transfer (To) From Reserve January 1 - December 31, 2024													
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Storage (GWH)													
Beginning of Period	73.723	54.801	48.622	61.316	73.336	68.387	73.383	57.444	48.421	36.432	44.006	77.996	
End of period	54.801	48.622	61.316	73.336	68.387	73.383	57.444	48.421	36.432	44.006	77.996	72.996	
Change	<u>(18.922)</u>	<u>(6.179)</u>	<u>12.694</u>	<u>12.020</u>	<u>(4.949)</u>	<u>4.996</u>	<u>(15.939)</u>	<u>(9.023)</u>	<u>(11.989)</u>	<u>7.574</u>	<u>33.990</u>	<u>(5.000)</u>	<u>(0.727)</u>
Production (GWH)	<u>34.718</u>	<u>32.083</u>	<u>52.703</u>	<u>49.496</u>	<u>35.586</u>	<u>37.270</u>	<u>30.171</u>	<u>18.071</u>	<u>13.903</u>	<u>14.171</u>	<u>30.870</u>	<u>44.083</u>	<u>393.125</u>
Actual Natural Flow (GWH)	15.796	25.904	65.397	61.516	30.637	42.266	14.232	9.048	1.914	21.745	64.860	39.083	<u>392.398</u>
Average Natural Flow (GWH)	32.900	30.400	45.100	69.300	47.100	26.500	19.400	14.500	26.000	36.100	41.600	34.300	<u>423.200</u>
Gross Variation	<u>(17.104)</u>	<u>(4.496)</u>	<u>20.297</u>	<u>(7.784)</u>	<u>(16.463)</u>	<u>15.766</u>	<u>(5.168)</u>	<u>(5.452)</u>	<u>(24.086)</u>	<u>(14.355)</u>	<u>23.260</u>	<u>4.783</u>	<u>(30.802)</u>
Debit (Credit) Transfer	\$ 3,106,941.60	\$ 816,698.40	\$ (3,686,950.05)	\$ 1,413,963.60	\$ 2,990,503.95	\$ (2,863,893.90)	\$ 938,767.20	\$ 990,355.80	\$ 4,375,221.90	\$ 2,607,585.75	\$ (4,225,179.00)	\$ (868,831.95)	<u>5,595,183.30</u>
Less: Income Tax @ 30.0%	<u>932,082.48</u>	<u>245,009.52</u>	<u>(1,106,085.02)</u>	<u>424,189.08</u>	<u>897,151.19</u>	<u>(859,168.17)</u>	<u>281,630.16</u>	<u>297,106.74</u>	<u>1,312,566.57</u>	<u>782,275.73</u>	<u>(1,267,553.70)</u>	<u>(260,649.59)</u>	<u>1,678,554.99</u>
Net Debit (Credit) Transfer	<u>\$ 2,174,859.12</u>	<u>\$ 571,688.88</u>	<u>\$ (2,580,865.03)</u>	<u>\$ 989,774.52</u>	<u>\$ 2,093,352.76</u>	<u>\$ (2,004,725.73)</u>	<u>\$ 657,137.04</u>	<u>\$ 693,249.06</u>	<u>\$ 3,062,655.33</u>	<u>\$ 1,825,310.02</u>	<u>\$ (2,957,625.30)</u>	<u>\$ (608,182.36)</u>	<u>3,916,628.31</u>