1 Q. Please identify the components of Newfoundland Power's Net Metering Service 2 Option which are not consistent with the provincial Net Metering Policy 3 Framework. 4 5 A. The single component of Newfoundland Power's Net Metering Service Option which is 6 not consistent with the provincial Net Metering Policy Framework (the "Framework") is 7 the rate at which net metering customers are compensated upon annual settlement of the 8 customer's net excess generation. 9 10 Section 3.4 (iv) of the *Net Metering Policy Framework* provides as follows: 11 "The customer will be compensated for the net excess generation at the 12 13 retail rates that are used to determine the bill for the customer's net 14 consumption. This retail rate will factor in existing subsidies, and should 15 represent the effective rate at which the customer is billed." 16 17 Newfoundland Power's Net Metering Service Option provides as follows: 18 19 "'Banked Energy Credits' are the amount of kWh energy supplied by the 20 Customer to the Company that exceeds the kWh energy supplied by the Company to the Customer...Settlement of Banked Energy Credits will be 21 computed based upon the then-current 2nd block energy charge in 22 Newfoundland and Labrador Hydro's Utility Rate applicable to service 23 24 provided to the Company."¹ 25 26 This deviation from the Framework is justified in light of the outlook for the 27 Island Interconnected System which is explained in the Company Evidence (page 28 18, et. seq) and the response to Request for Information PUB-NP-001. In these 29 circumstances, this deviation, which is consistent with current Canadian public

32 structure.

utility practice, better meets (i) the requirements of Section 3 of the *Electrical Power Control Act*, 1994 and (ii) the accepted attributes of a sound utility rate

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See Application, Schedule A, page 32.