Newfoundland Power states that using the 2nd block Utility Rate in the annual settlement of credits ensures that Newfoundland Power pays a reasonable approximation of system marginal energy costs for accumulated energy credits. How will Newfoundland Power address the net metering rate if there are changes in marginal energy costs which can only be reflected in the utility rate through a general rate application?

A. Newfoundland Power observes that current regulatory expectations are that the Newfoundland and Labrador Hydro utility rate (the "Utility Rate") will be set by the Board in the first half of 2017. The Utility Rate will further be considered based upon a 2018 test year in a general rate application to be filed in the first half of 2017. The Utility Rate will be further considered in the context of the interconnection of Muskrat Falls before 2020. Given this forecast schedule, Newfoundland Power sees little risk that substantial changes in marginal energy costs will not be reflected in the Utility Rate in a timely way up to the interconnection of Muskrat Falls.

In this Application, Newfoundland Power proposes a re-examination of the pricing associated with the Net Metering Service Option once the impacts on system costs and customer rates resulting from the interconnection of Muskrat Falls are known. An issue to be considered in such a re-examination is ensuring that the Net Metering Service Option continues to appropriately reflect system costs.

Finally, Newfoundland Power's ongoing monitoring of the Net Metering Service Option will include consideration of changes in the marginal cost of energy on the Island Interconnected system. If, as a result of changes in system marginal energy costs, the rate applicable to the annual settlement of energy credits is no longer appropriate, then action can be taken to ensure the Net Metering Service Option continues to appropriately reflect system costs in a timely way. This occurs routinely for Newfoundland Power's existing rates, including the Curtailable Service Option.