2 buses were found to be more sensitive to economics and will require substantial support in the 3 form of incentives or changes in key economic factors to trigger any significant shift in adoption beyond natural market uptake. In light of this has there been any analysis of whether the 4 proposed incentives will be effective and why the recovery of the costs of the proposed 5 commercial utility EV incentives should be approved for this province at this time? 6 7 8 This Request for Information relates to the Electrification, Conservation and Demand 9 Α. Management Plan: 2021-2025 (the "2021 Plan") developed in partnership by Newfoundland and 10 11 Labrador Hydro and Newfoundland Power ("Hydro" or, collectively, the "Utilities"). Accordingly, the response reflects collaboration between the Utilities. 12 13 The Commercial Electric Vehicle ("EV") and Charging Infrastructure Program is part of a 14 diversified portfolio of programs. At this time, only light-duty vehicles will be eligible for an incentive under this program. 15 A significant portion of forecast electricity demand associated with EVs in the province is 16 expected to come from commercial vehicles. However, in the early years, the adoption of 17

The Dunsky report suggests on page 113 that generally medium and heavy-duty vehicles and

¹ "Application for Approvals Required to Execute Programming Identified in the Electrification, Conservation and Demand Management Plan 2021–2025," Newfoundland and Labrador Hydro, rev. 1, July 8, 2021 (originally filed June 16, 2021), sch. 3,

medium and heavy-duty vehicles is expected to be minimal due to low model availability and

The Utilities' portfolio of customer electrification programs includes a Custom Fleet Pilot

Program for medium and heavy-duty vehicles.² The pilot program will allow the Utilities to

understand the unique barriers associated with adopting electric medium and heavy-duty

vehicles. The pilot program will also allow the Utilities to pilot initiatives that will encourage off-

sch. K, p. 1 of 3.

higher upfront capital costs.¹

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² Ibid.

1	peak charging. Opportunities for vehicle-to-grid technologies will also be explored. 3 The results
2	of this pilot project will inform future program development, including load management
3	programs.
4	Please refer to Hydro's response to PUB-NLH-004 on why the Utilities' diversified portfolio of
5	programs is appropriate.
6	Please refer to Hydro's response to PUB-NLH-006 on the Utilities' approach to achieving load
7	management.

³ Vehicle-to-grid technologies enable energy to be pushed back to the electricity grid from the battery of an EV.