Q. Phase 1 of the Ultra-Fast DCFC Electric Vehicle Chargers Project was approved by the Board in Order No. P.U. 21(2023). In that application, it was noted that the Provincial Government would hold legal title to these chargers for an initial three-year period before being transferred to Hydro and that Hydro would operate and maintain the chargers on the Government's behalf.

a. Please provide an update to the legal title plan for the chargers approved in Order No. P.U. 21(2023).

b. Please confirm if the Provincial Government will also hold legal title to the chargers proposed in this Application, including the solar generation and battery backup for the charging stations on the isolated systems. Please explain the approach.

c. For the assets on the isolated systems, please explain how the services will be billed and whether the full costs including the cost of generation will be reflected in the rates. If not, explain how the shortfall will be recovered.

A. a. There are no changes to the legal title plan for the chargers approved in Board of Commissioners of Public Utilities ("Board") Order No. P.U. 21(2023).

b. Newfoundland and Labrador Hydro ("Hydro") will hold legal title to all assets proposed in this Application, including the solar generation and battery backup for the charging stations on the isolated systems. The requirement for the Government of Newfoundland and Labrador to hold legal title to the Ultra-Fast Phase 1 chargers was specific to that funding arrangement which included a partial funding contribution by the Government of Canada ("Canada"). Canada is not providing any funding for the chargers described in this Application.

c. Please refer to Hydro's response to PUB-NLH-002 for a detailed description of the Labrador South charging assets, and how they have been designed to limit any impact on Hydro's isolated systems.

Hydro has proposed that its isolated Direct Current Fast Chargers ("DCFC") include solar generation for energy, batteries for capacity, and a minimal grid connection for reliability. Hydro has designed the solar system to produce enough energy to charge approximately 100 vehicles annually, and therefore Hydro expects this to be sufficient to meet the annual energy usage at these charging sites for the initial years following installation.[1] The battery storage system ensures that only a minimal grid connection is required, mitigating concerns associated with peak load and system capacity requirements.

Similar to Hydro's other DCFCs operating in its service area, these sites will be metered and reported as 'own use'. This will allow Hydro to track site energy consumption versus solar production. In the event that Electric Vehicle ("EV") charging requires less energy than solar production, excess solar generation will be supplied to the grid thereby lowering the rural deficit through decreased diesel generation requirements. If EV charging needs exceed solar generation throughout the life of the asset, Hydro will have the option to add more solar generation to better match the growth in EV charging in the region.

In Board Order No. 27(2020), the Board determined that rates, tolls or charges for the provision EV charging services do not require Board approval. Hydro does not charge cost-based prices for any EV charging services, but rather market-based pricing. Hydro has not yet determined the rates for the proposed isolated chargers; however, it will be based on market pricing consistent with its interconnected DCFCs.

Hydro Quebec's charging network, Circuit Electrique, operates chargers with a similar configuration (solar and batteries) as proposed by Hydro on its isolated systems; these chargers have the same pricing as similar units on their interconnected system.[2] In this regard, Hydro's proposed approach to operating DCFCs in isolated systems is consistent

[1] The two interconnected chargers nearest to the proposed isolated sites are located in Port au Choix and Happy Valley-Goose Bay, and saw annual DCFC sessions of 103 and 84, respectively.
[2] The Fire Lake DCFC operates with solar and batteries, with pricing of $0.37/kWh for a 50 kW DCFC. This pricing is consistent with other 50 kW DCFCs operated by Circuit Electrique.

with practice in Quebec for both planned pricing, and limiting the impact on isolated systems.