Q. **Reference: Application, Chapter 2, page 2.25**

Hydro states "*Since 2019, Hydro has incurred $9.1 million in costs to deliver CDM initiatives to achieve its 16,067 MWh in cumulative energy savings.*"

a) What is the total *"behind-the-meter"* contribution to the IIS by 2035 assumed in Hydro's planning forecast?

b) By comparison, Manitoba Hydro identifies *"customer-side solutions totalling 860 MW"* over the next 10 years (see Manitoba Hydro's 2025 Integrated Resource Plan published January 2026, page 14). Explain why Manitoba's customer-side solutions appear to be much more successful than NL's customer-side solutions, including a comparison of *"customer-side solution"* amounts to peak demand in each province by the year 2035.

A. **a)** The load forecast reflects historical customer load and therefore inherently includes the impact of existing behind-the-meter resources. No separate forecast adjustment for behind-the-meter generation is currently applied in the load forecast. Newfoundland and Labrador has seen minimal behind-the-meter resources installed since 2017, with a total of 1,187.1 kW net metering installations approved as of December 31, 2025,[1] which is approximately 24% of the provincial maximum of 5 MW for net metering.

b) Conservation and Demand Management ("CDM") programs in the province are offered under the TakeCharge brand, a joint partnership between Newfoundland and Labrador Hydro ("Hydro") and Newfoundland Power Inc. ("Newfoundland Power").

Despite the joint customer-facing TakeCharge brand, CDM reporting is separated by each respective utility's customer base. Newfoundland Power serves the majority of customers

[1] Net metering reports are filed annually with the Board of Commissioners of Public Utilities ("Board") and are available on the Board's website at the following link: http://www.pub.nl.ca/indexreportspages/netmetering.php.

on the island portion of the province (approximately 280,000 at the end of 2025)[2] and therefore provides the majority of CDM programming on the Island Interconnected System.

The CDM programming results referenced in Hydro's 2026 General Rate Application represent only those achieved from Hydro's approximately 39,600 Rural customers across all systems; approximately 23,350 of which are on the Island Interconnected System.[3] For details on Hydro's planned solar heat pump pilot program in isolated systems, please refer to Hydro's response to PUB-NLH-063 of this proceeding.

Hydro cannot speak to Manitoba Hydro's Integrated Resource Plan, particularly in the context of CDM programming, which is primarily offered on the Island Interconnected System by Newfoundland Power.

[2] Newfoundland Power's 2025 Annual Return notes 279,640 customers at the end of 2025. Please refer to "Newfoundland Power Inc. 2025 Annual Returns," Newfoundland Power Inc. March 31, 2026, Return 14.
[3] Hydro serves and provides CDM programming to customers on the Island Interconnected System, Labrador Interconnected System, L'Anse-au-Loup System, Labrador Diesel Systems, and Island Diesel Systems. Hydro also provides CDM programming to Industrial customers in the province.