Q. **Reference: Volume I, Section 2.3.4, Issue Topic: Rural Deficit**

Please provide in a table, operating cost savings (by labour and non-labour) associated with the implementation and operation of Automated Meter Reading ("AMR") technology from 2019 to the 2027 test year. In the table please also provide the AMR meters installed each year, the cumulative total and the cumulative percentage of total AMR change outs completed.

A. Newfoundland and Labrador Hydro ("Hydro") has been using various generations of Automated Meter Reading ("AMR") technology for a number of years. Most recently, Hydro completed an AMR project from 2022 through 2025 to install 32,416 AMR meters that are based on drive-by meter reading technology.[1] Please refer to Table 1 for the number of installations each year throughout this project.

Given the passage of time since the AMR installation began, together with the various offsetting cost increases and reductions across business units, any savings associated with the reduction in meter reading costs have become embedded within overall operating costs. As a result, it is not feasible to isolate and quantify the impact of this change.

In terms of operational efficiencies, the drive-by AMR technology has reduced estimated meter readings by approximately 80%, leading to fewer billing-related customer inquiries and improved billing accuracy. Historically, estimated bills were among the most frequent billing concerns received by the call center. Additionally, in 2026 Hydro was able to reduce frontline resources associated with call center operations and meter reading positions. While it is difficult to isolate the portion as a result of AMR, the technology has directly contributed to the reduction.

[1] The Replace Metering System Project was approved in Board of Commissioners of Public Utilities Order No. P.U. 37(2021). AMR meter installations approved in Board Order No. P.U. 2(2026) as part of the Upgrade PLX Metering System Project have not started.

Table 1: Meters Installed as Part of Replace Metering System Project

Year	Annual Total	Total Cumulative (%)
2022[2]	-	-
2023	8261	26.0
2024	29,484	91.0
2025	32,317	99.7

[2] No meters were installed as part of the Replace Metering System Project in 2022 due to the Information Systems setup.