1 Q. (Reference CA-NP-031) NP states that the New Services program "involves 2 the installation of service wires to connect new customers to the electrical 3 distribution system. In general, these installation costs are within the 4 definition of the Company's basic investment, as outlined in its Residential 5 and General Service CIAC Policies, requiring no contribution from the 6 customer towards the capital cost." 7 What is the rationale for not requiring even a minimal capital contribution for new service even if it is within the company's definition of basic investment? 8 9 10 In accordance with the Electrical Power Control Act, 1994, Newfoundland Power is A. 11 required to provide customers with equitable access to an adequate supply of power in a manner that is not unjustly discriminatory. Demanding contributions from new 12 13 customers seeking electricity service is contrary to these requirements.

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The Company's basic capital investment to connect new customers is governed by its *Residential and General Service CIAC Policies,* which are approved by the Board. These policies define the standard infrastructure provided without requiring a customer contribution.<sup>2</sup>

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21 22 Electricity rates charged to customers are established through a general rate application and a detailed cost of service study, both reviewed and approved by the Board.<sup>3</sup> These rates are designed to reasonably recover the costs of serving each customer class, including the infrastructure and investment necessary to provide service.

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Requesting additional contributions from customers for costs already accounted for in approved rates would be inconsistent with the principles of regulated rate-setting and contrary to Board-approved policies.

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As such, Newfoundland Power only requires customer contributions towards the cost of requested capital work in cases where the costs exceed what can reasonably be recovered through approved customer rates.

<sup>&</sup>lt;sup>1</sup> See sections 3 and 4 of the *Electrical Power Control Act, 1994*.

<sup>&</sup>lt;sup>2</sup> See Newfoundland Power's *Residential and General Service Contribution in Aid of Construction Policies, Effective January 27, 2025*, approved by the Board in Order No. P.U. 4 (2025).

<sup>&</sup>lt;sup>3</sup> See the Company's Approval of Compliance with Order No. P.U. 3 (2025) and Customer Rates, Rules and Regulations, effective July 1, 2025.