

Office of the Consumer Advocate

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December 4, 2023

Board of Commissioners of Public Utilities
Prince Charles Building
120 Torbay Road
P.O. Box 21040
St. John's, NL A1A 5B2

Attention: Jo-Anne Galarneau
Executive Director and Board Secretary

Dear Ms. Galarneau:

Re: Newfoundland and Labrador Hydro – 2023-2024 Winter Readiness Planning Report dated November 10, 2023 and Near-Term Reliability Report dated November 15, 2023 – Request for Comments

We have the Board's Request for Comments respecting the liability and resource adequacy for the 2023-2024 winter. Ratepayers too, once informed, may be anxious in reference to this issue. It seems that the fallout from the Muskrat Falls Project and the uncertainties relating to the Labrador-Island Link will continue to be troubling.

Comments have already been provided to the Board in our submission on the Newfoundland and Labrador Hydro 2024 Capital Budget Application, wherein recommendations were made and enumerated on broader issues for the consideration of the Board.

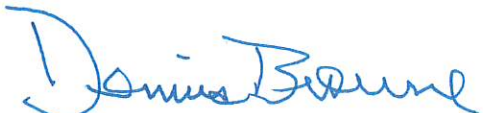
Also, the submission recommended as follows:

It is the Consumer Advocate's view that now is the opportune and crucial time for providing consumers with greater control over their electricity consumption characteristics and their energy expenditures to benefit not only themselves, but also the provincial energy supply system. **An ambitious timeline is needed for leveraging the "prosumer" concept including the implementation of time-varying rates together with the requisite metering.** Embracing the "prosumer" concept will ensure effective and efficient use of existing energy infrastructure before embarking on rebuilds and new wires ventures. This approach is necessary if government net-zero carbon efforts and the environmental requirements set out in provincial legislation are to be met in a timely fashion. [emphasis added]

This past failure to implement time of use rates when it was opportune to do so has become all the more relevant. Hydro has informed that Holyrood will be required until at least 2030.

We request that Hydro keep ratepayers informed on these issues which cause the Board concern and develop plans accordingly.

Yours truly,



Dennis Browne, KC
Consumer Advocate

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