



Prince Edward Island Île-du-Prince-Édouard

Legislative Assembly

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Island Regulatory and Appeals Commission
PO Box 577
Charlottetown, PE C1A 7L1

Dear Commissioners,

Please find enclosed a copy of the brief that I will be presenting to the Commission.

This brief is being filed as evidence with respect to Maritime Electric Company Limited's General Rate Application UE20944.

This brief demonstrates the discriminatory nature of the existing rate structure and proposes an alternative structure that (a) eliminates the discriminatory weighing of electrical costs and through a more equitable distribution alleviates the unfair burden placed on low-income and low-usage energy users; (b) encourages high-energy users to utilize measures to increase their energy efficiency; and (c) addresses our collective need to mitigate the reality of changing climate in measures that are both measurable and effective.

If you require any additional information, please feel free to contact me. Thank you.

Sincerely,

Stephen Howard, MLA
Opposition Shadow Critic – Transportation, Infrastructure and Energy
Office of the Official Opposition
Legislative Assembly of Prince Edward Island

Introduction

Prince Edward Island's *Electric Power Act* regulates the provision of electric power in the province. The act's preamble outlines its purpose thusly:

WHEREAS the rates, tolls and charges for electric power should be reasonable, publicly justifiable, and non-discriminatory;
AND WHEREAS the regulation of public utilities supplying electric power should be conducted in a manner that is efficient;
AND WHEREAS public utilities should utilize energy efficiency and demand-side resource measures whenever it is cost-effective to do so;
AND WHEREAS the system of regulation of such public utilities should allow public input whenever the rates, tolls and charges for electric energy seem, in any respect, to be unreasonable or unjustly discriminatory; 2013, c. 12, s. 1.¹

For years, there has been discussion on the continued use of the second block of electricity. As noted by the Island Regulatory and Appeals Commission in 2010:

*"In true cost of service terms, the Commission was not presented with evidence that warrants retention of the declining 2nd block rate. However, evidence was heard that the residential rate class itself is seriously flawed. **Adopted in 1994 from the NB Power rate structure, this rate structure is out of date.**"²*

While we have continued to employ an out-of-date rate structure, other Canadian jurisdictions have shifted to rate structures that discourage excessive electricity use either through the implementation of an ascending block structure that charges more for greater electricity use, or through the introduction of time-of-use rate structures that encourage electricity use at off-peak hours. British Columbia, Ontario, and Québec are all examples of provinces that have taken such approaches.³

Impacts on Low-Income Islanders

In keeping with its mandate to regulate electricity in a fair manner, IRAC should consider the ways in which energy prices affect low-income Islanders. Low-income households spend a larger proportion of their budget on energy costs. As the Energy Efficiency Working Group noted in their paper, "Energy Efficiency and Energy Affordability for Low Income Households":

"As of 2003, the lowest-income quintile of households spent over four times the percentage of its pre-tax income on fuel and electricity (9.1%) as did the 3rd quintile (2.1%) and almost nine times the percentage of the top quintile (1.1%). Families with

¹ https://www.princeedwardisland.ca/sites/default/files/legislation/e-04_0.pdf

² <http://www.irac.pe.ca/document.aspx?file=orders/electric/2010/ue10-03.htm>

³ For a detailed overview of the respective rate schemes employed in each Canadian province, please see "Appendix A: Jurisdictional Scan".

incomes below Statistics Canada's Low Income Cut-Off (LICO) averaged 20.3% of their total expenditure on fuels and electricity, versus 7.0% for those above the LICO.⁴

A 2014 paper, "Impact of Increases in Electricity Rates on Low and Non Low Income Households in Manitoba," looked at the impacts of electricity rate prices on low-income and non-low-income households. This paper equally found that low-income households spent more of their budget on basic necessities like electricity than non-low-income households. It further found that variations in electricity prices had impacts on household spending, with higher electricity prices leading to less spending on food, shelter, education, and other areas⁵.

Low-income Islanders, as a result of their financial situation, have less of an ability to reduce their carbon footprint and energy use than higher-income Islanders. Furthermore, low-income people might live in older rental units or older homes, built at a time when energy efficiency was less of a priority, and are unable to afford upfront upgrades. Lastly, unlike other Canadian jurisdictions, Prince Edward Island has no dedicated funding source for the subsidization of electric bills of low-income residents.⁶

Impacts on Climate Change Mitigation

As Prince Edward Island continues to face the challenges posed by climate change, a transition toward electricity rate structures that encourage energy efficiency will be a meaningful step towards reducing our carbon footprint and meeting our greenhouse gas reduction targets. While PEI has relatively clean electricity (approximately 69% from non-carbon-emitting sources), commercial, agricultural and residential electricity still make up a considerable percentage of the province's total carbon emissions.⁷ By establishing an ascending block rate system, the province will be in effect providing larger energy consumers - those with the greatest financial capacity to increase their energy efficiency - incentive to reduce their carbon footprint.

MECL Proposal

We do not support any proposal to maintain to maintain a residential class second block that is priced lower than the first block. Similarly, we do not support any proposal to phase out the second block of energy so that there is a single energy price.

⁴ Energy Efficiency Working Group. "Energy Efficiency and Energy Affordability for Low Income Households". November 2008. Available here:

http://publications.gc.ca/collections/collection_2009/ec/En4-100-6-2008E.pdf

⁵ Stevens, Harvey, and Simpson, Wayne. "Impact of Increases in Electricity Rates on Low and Non Low Income Households in Manitoba".

http://www.pubmanitoba.ca/v1/nfat/pdf/vulnerable_consumers_stevens_simpson.pdf

⁶ For example, Ontario offers the Ontario Energy Support Program, a monthly scalable rebate on electricity bills, and the Low-income Energy Assistance Program (LEAP), a one-time grant for low-income residents behind on their electricity bills. <https://www.oeb.ca/rates-and-your-bill/help-low-income-consumers>

⁷ "Prince Edward Island Carbon Pricing Plan" September 2018. Available here:

<http://www.assembly.pe.ca/docs/carbon-pricing-plan-sept-2018.pdf>

The preamble of the *Electric Power Act* would support this conclusion: “public utilities should utilize energy efficiency and demand-side resource measures whenever it is cost-effective to do so”⁸. A cheaper second block runs contrary to demand-side management.

As the Commission notes in paragraph 58 of Order UE16-04R, “[t]he residential second block is not based on cost of service; in effect, it is a method to subsidize electricity costs for certain classes of consumers...” and furthermore stated, in paragraph 59 of the same order, “any proposed continuation of the residential second block rate in future rate applications will require compelling evidence of its equity to ratepayers.”⁹

Based on the submissions of MECL, there is no compelling evidence of the second block’s equity as it exists presently. Farm customers continue to disproportionately benefit from a cheaper second block rate while a majority of non-farm residential customers fall under the more expensive first block. As the Commission wrote in Order UE10-03, this contravenes the principle of fairness enshrined in the *Electric Power Act*:

“...rates must be based on the cost of providing this service. That means rates do not take into consideration the characteristics of the customer such as farming, fishing, home heat or industrial usage. Rates developed with a rate design objective of fairness based on cost of service are the requirements of the legislation.”¹⁰

Table1: Number of Residential Customers by Monthly Consumption Range												
February 2017 and July 2017												
Monthly Consumption Range (kWh)	February 2017 Customers						July 2017 Customers					
	Farm		Non-Farm		Total		Farm		Non-Farm		Total	
	Custo mers	%	Custo mers	%	Custo mers	%	Custo mers	%	Custo mers	%	Custo mers	%
1 to 650	641	32.0%	27,752	48.8%	28,393	48.2%	1163	56.7%	45053	70.3%	46216	69.9%
651 to 1300	431	21.5%	15,766	27.7%	16,197	27.5%	493	24.0%	16,263	25.4%	16,756	25.3%
1,301 to 5,000	630	31.4%	12,935	22.7%	13,565	23.0%	251	12.2%	2678	4.2%	2929	4.4%
5,000 and greater	302	15.1%	440	0.8%	742	1.3%	144	7.0%	77	0.1%	221	0.3%
Total	2,004	100.0%	56,893	100.0%	58,897	100.0%	2051	100.0%	64071	100.0%	66122	100.0%

Source: Maritime Electric Company. “Application and Evidence of Maritime Electric Company, Limited”. Nov 28, 2018. Page 133.

⁸ https://www.princeedwardisland.ca/sites/default/files/legislation/e-04_0.pdf

⁹ IRAC. “Order UE16-04R”. July 11, 2016. Available here: <http://www.irac.pe.ca/document.aspx?file=orders/electric/2016/ue16-04r.htm>

¹⁰ IRAC. “Order UE10-03” at paragraph 89. Available here:

The preamble of the Act encourages the use of “demand-side resource measures whenever it is cost-effective to do so,” and it is in that vein that I propose a restructuring of residential electric rates.

My proposed rate structure would contain three blocks: a first block with the cheapest rate, a second block with middle rate, and a third block for customers with high levels of electricity use that would have the highest rate. Taking into account the heavy seasonal impacts on electricity use in Canada, the kWh boundaries for each block would vary between a summer period (beginning May 1 and ending October 31) and a winter period (beginning November 1 and ending April 30).

Figure 2: Steve Howard Proposed Model

Period	Use	Rate
Summer (May 1 - Oct 31)	Up to 650 kWh	TBD (lowest)
	651-3000 kWh	TBD
	3000+ kWh	TBD (highest)
Winter (Nov 1 - Apr 30)	Up to 1300 kWh	TBD (lowest)
	1301-5000 kWh	TBD
	5000+ kWh	TBD (highest)

Under my proposed model, and using the data provided in Schedule 13-9, it is estimated that 75.7% of all residential customers would fall under the first block in February, and 69.9% would fall under the first block in July. In the absence of exact data relating to the energy consumption of residential customers, I am unable to recommend a specific rate for each block, but I would like the residential R/C ratio to remain close to what it is today. In principle, I recommend a reduced rate in the first block, with a greater rate in the second, and a further escalation for customers who use above 5000 kWh per month. An Island home of 2000 sq ft can charge an electric car for regular use, be heated, and powered all from electricity for much less than 5000 kWh per month. Since this a residential rate class it makes sense to tailor it to be fair to the most households possible.

My proposed rate structure would have different impacts depending on where one finds themselves with respect to energy usage. Most residential customers would incur less energy-related expenses as a result of a lower first block rate. This would especially benefit low-income

Islanders who can reallocate spending to other essentials. Residential customers who find themselves in the second and third blocks would generally experience greater energy costs. However, this increased price sets a price signal for second- and third-block users to find efficiencies to reduce their energy consumptions.

In the absence of the customer usage data necessary to present a detailed overview of my proposed rate structure, I request an order from the Commission that MECL prepare a complete rate design proposal, including all necessary supporting reports and data, toward the establishment of rates for an amended residential class.

I further request that the amended residential class block structure proposed here be implemented in 2021.

Appendix A: Jurisdictional Scan

British Columbia

British Columbia uses a Residential Conservation Rate, a two-tiered rate structure that is designed to promote conservation.

Basic Charge = A small, daily amount that partially recovers fixed customer-related costs, including customer service channels, metering, billing, payment processing, collections, and distribution system costs that are customer-related (electrical lines and transformers).

Rates for BC Hydro Residential Users¹¹

Type of Charge	Rate
Basic Charge	\$0.2090 per day
Energy Charge	Step 1: \$0.0945 per kWh for first 1,350 in an average two month billing period Step 2: \$0.1417 per kWh over the 1,350 Step 1 threshold.
Minimum Charge	\$0.2090 per day (equal to the basic charge)

A study by BC Hydro evaluated the impacts of their Residential Inclining Block (RIB), a two-tier block structure where customers pay a lower price for first block energy and a higher price for second block energy. The study found that some positive conservation impacts were achieved as a result of switching to the RIB.¹²

Alberta

Although Alberta allows energy users to purchase energy from competitive providers, the province also has a regulated rate system (known as the “Regulated Rate Option” or RRO) available to residential consumers or businesses using less than 250,000 kWh/year. Rates within the regulated rate system are set monthly through the Alberta Utilities Commission, which currently caps all regulated rates for RRO users at 6.8 ¢ /kWh (the provincial government subsidizes any energy charge over and above this cap). Monthly energy bills for RRO users also include charges for transmission, administration, and distribution, which can differ from region to region.¹³

¹¹ <https://app.bchydro.com/accounts-billing/rates-energy-use/electricity-rates/residential-rates.html>

¹² BC Hydro. “Evaluation of the Residential Inclining Block Rate”. June 2014. Available here: <https://www.bchydro.com/content/dam/BCHydro/customer-portal/documents/corporate/regulatory-planning-documents/revenue-requirements/10-RIB-Evaluation-report.pdf>

¹³ For more on energy rates within The City Saskatoon, see <https://www.saskatoon.ca/services-residents/power-water/saskatoon-light-power/electrical-rates>.

Saskatchewan

In Saskatchewan, electricity rates are reviewed by the Saskatchewan Rate Review Panel. SaskPower is the sole electricity distributor in all regions of the province except Saskatoon, where energy is distributed by Saskatoon Light & Power.¹⁴

SaskPower and SL&P rates consist of a basic monthly charge - a flat service fee that covers administration costs and costs associated with maintaining and repairing the provincial energy grid - and a charge for the actual use of energy.

Rates for SaskPower Residential Users¹⁵

Type of Charge	Rate for Cities	Rate for Towns, Villages and Urban Resorts	Rate for Rural and Rural Resorts
Basic Charge	\$22.79/month	\$22.79/month	\$32.90/month
Energy Charge	14.228¢/kWh	14.228¢/kWh	14.229¢/kWh
Minimum Charge	Basic monthly charge	Basic monthly charge	Basic monthly charge
Federal Carbon Charge	0.3095¢.kWh	0.3095¢.kWh	0.3095¢.kWh

Rates for SaskPower Farm Users¹⁶

Type of Charge	Standard Rate	Irrigation Rate	Irrigation (Interruptible) Rate
Basic Charge	\$34.97/month	\$480.28 (basic seasonal charge)	\$905.57/month per meter location (April to October)
Energy Charge	12.658¢/kWh for first 16,000kWh/month; 5.488¢/kWh afterwards	7.078¢/kWh	6.064¢/kWh
Demand Charge	\$0 for first 50 kVA/month; \$12.848/kVA afterwards	N/A	N/A
Federal Carbon Charge	0.2994¢/kWh	0.2994¢/kWh	0.2994¢/kWh

¹⁴ <https://energyrates.ca/saskatchewan/explaining-your-saskatchewan-electricity-natural-gas-rates/>

¹⁵ <https://www.saskpower.com/Accounts-and-Services/Billing/Power-Rates/Power-Supply-Rates>

¹⁶ <https://www.saskpower.com/Accounts-and-Services/Billing/Power-Rates/Power-Supply-Rates>

Minimum Charge	Basic monthly charge plus \$4.869	Basic seasonal charge	Basic charge
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Rates for SaskPower Commercial and Non-Residential Users (Greater than 75 kVA and up to and including 3,000 kVA)¹⁷

Type of Charge	Rate for Urban Users	Rate for Rural Users
Basic Charge	\$57.94/month	\$65.03/month
Demand Charge	\$0 for first 50 kVA/month; \$15.600/kVA afterwards	\$0 for first 50 kVA/month; \$15.600/kVA afterwards
Energy Charge	First block (16,750 kWh/month): 11.987¢/kWh; second block: 7,674¢/kWh	First block (15,500 kWh/month): 11.987¢/kWh; second block: 7,270¢/kWh
Federal Carbon Charge	0.3025¢/kWh	0.3025¢/kWh
Minimum Charge	Basic monthly charge plus \$4.869/kVA of the maximum recorded demand over 50 (kVA) registered over the past 11 months.	Basic monthly charge plus \$4.869/kVA of the maximum recorded demand over 50 (kVA) registered over the past 11 months.

Small Commercial Rate for SaskPower Users (Up to and including 75 kVA)¹⁸

Type of Charge	Rate for Urban Users (25kV & Less)	Rate for Rural Users (25kV & Less)
Basic Charge	\$31.14/month	\$41.49/month
Demand Charge	\$0 for first 50 kVA/month; \$15.148/kVA afterwards	\$0 for first 50 kVA/month; \$15.475/kVA afterwards
Energy Charge	First block (14,500 kWh/month): 13.669¢/kWh; second block: 7.218¢/kWh	First block (13,000 kWh/month): 14.399¢/kWh; second block: 7.406¢/kWh
Federal	0.3025¢/kWh	0.3025¢/kWh

¹⁷ <https://www.saskpower.com/Accounts-and-Services/Billing/Power-Rates/Power-Supply-Rates>

¹⁸ <https://www.saskpower.com/Accounts-and-Services/Billing/Power-Rates/Power-Supply-Rates>

Carbon Charge		
Minimum Charge	Basic monthly charge plus \$4.869/kVA of the maximum recorded demand over 50 (kVA) registered over the past 11 months.	Basic monthly charge plus \$4.869/kVA of the maximum recorded demand over 50 (kVA) registered over the past 11 months.

SaskPower non-residential users requiring more than 3,000 kVA are served through customer-owned transformation. Within this customer-owned transformation system, a power time-of-use rate is applied for large commercial, farm, and industrial loads at three levels: 25kV, 72kV, and 100kV & Above. Generally, this customer-owned transformation system uses a descending block structure. Additionally, SaskPower provides separate rates for electricity used for oil and gas production.

Manitoba

In Manitoba, electricity rates consist of a basic monthly charge - a flat fee that covers the cost of maintaining, repairing, and upgrading the Manitoba energy grid, and the energy charge, which covers actual electricity use. For electricity, a flat rate is used for residential energy charges, while a descending block structure is used for general service (i.e. energy is cheaper as you use more)¹⁹.

Ontario

Ontario employs two different types of rates: time-of-use and tiered.

The time-of-use rate is charged to most residential and small business customers. The rate is split into three sections: off-peak, which is when demand for electricity is lowest; mid-peak, when demand is moderate; and on-peak, when demand is the highest²⁰. The rates for these categories are 6.5 cents/kWh, 9.4 cents/kWh and 13.4 cents/kWh, respectively²¹.

Ontario's tiered rates charges a lesser amount for your first block of energy, and a greater rate for energy use beyond the first block. For residential use, the thresholds vary during the year, while they remain consistent for non-residential use.

Ontario Tiered Rates, Residential and Non-Residential, as of May 1, 2019			
Category	When	How much	Rate (¢ per kWh)

¹⁹ <https://energyrates.ca/manitoba/explaining-your-manitoba-electricity-and-natural-gas-rates/>

²⁰ Ontario Energy Board. "Managing costs with time-of-use rates". Available here: <https://www.oeb.ca/rates-and-your-bill/electricity-rates/managing-costs-time-use-rates>

²¹ Ontario Energy Board. "Electricity Rates". <https://www.oeb.ca/rates-and-your-bill/electricity-rates>

		electricity you use	
Residential	Summer (May 1 - Oct 31)	Up to 600 kWh	7.7
		More than 600 kWh	8.9
	Winter (Nov 1 - Apr 30)	Up to 1,000 kWh	7.7
		More than 1,000 kWh	8.9
Non-Residential	All seasons	Up to 750 kWh	7.7
		More than 750 kWh	8.9
Source: Ontario Energy Board ²²			

Québec

Electricity in Québec is regulated by the Régie de l'énergie and distributed by Hydro Québec. The standard rate for residential and farm customers with a general power demand of less than 50kW/month (known as "Rate D") consists of a basic system access charge - a flat fee which covers administrative costs and those associated with maintaining the provincial power grid - and a variable fee associated with energy consumption. Rate D's tiered structure charges a lesser amount to users within the first block, and a greater amount in the second block.

Rates for "Rate D" Residential and Farm Users²³

Type of Charge	Rate
System Access Charge	40.64¢/day
Energy Charge	First block (up to 40kWh/day): 6.08¢/kWh; second block: 9.38¢/kWh

²² More information here: <https://www.oeb.ca/rates-and-your-bill/electricity-rates#tiered>

²³ <http://www.hydroquebec.com/residential/customer-space/rates/rate-d.html>

Beginning in Winter 2019-2020, users eligible for “Rate D” have the option of switching to “**Rate Flex D**”, a rate scheme that allows users to reduce costs by lowering their usage during critical peak events, when electricity will be more expensive.²⁴

Rates for “Rate Flex D” Users (Effective Winter 2019-2020)²⁵

Type of Charge	Rate for Summer Period (April 1-Nov. 30)	Rate for Winter Period (Dec. 1-March 31)
System Access Charge	40.64¢/day	40.64¢/day
Energy Charge	First block (up to 40kWh/day): 6.08¢/kWh; second block: 9.38¢/kWh	First block (up to 40kWh/day): 4.28¢/kWh; second block: 7.36¢/kWh
Energy charge during peak events	N/A	50.00

“**Rate DP**” generally applies to residential and farm users with power demands greater than 50kW/month (although users with demands up to 65kW/month are still eligible for “Rate D”). Like “Rate D”, “Rate DP” utilizes a two-tier, ascending rate structure but differs from the former rate structure by replacing the system access charge with a seasonal charge for power demand in excess of 50kW.

Rates for “Rate DP” Residential and Farm Users²⁶

Type of Charge	Rate
Energy Charge	First block (up to and including 1200kWh/month): 5.88¢/kWh; second block: 8.94¢/kWh
Charge for Power Demand in Excess of 50kW	Winter Period: \$6.21/kW Summer Period: \$4.59/kW
Minimum Charge	\$12.18/month for single-phase electricity; \$18.27/month for three-phase electricity

Québec Hydro also offers separate electricity rate schemes, both featuring two ascending block rates, for residential users in the province’s far north (“**Rate DN**”) and residential users in multi-

²⁴ According to Quebec Hydro, “critical peak events” take place “weekdays from December 1 to March 31, between 6 and 9 a.m. and between 4 and 8 p.m., for a maximum of 100 hours each winter.”

²⁵ <http://www.hydroquebec.com/residential/customer-space/rates/rate-flex-d.html>

²⁶ <http://www.hydroquebec.com/residential/customer-space/rates/rate-dp.html>

unit buildings (“**Rate DM**”), and also offers a rate scheme for residential and farm customers using both electricity and fuel (“**Rate DT**”).

Québec Hydro offers several different rates schemes for businesses and industrial operations. The most common business rate schemes, “**Rate G**” and “**Rate M**”, both employ a two-tiered descending blocks.²⁷

New Brunswick

Electricity in New Brunswick is regulated by the New Brunswick Energy and Utilities Board and distributed by NB Power. The standard rate for residential customers consists of a flat service charge and charges related to energy use. Residential rates are single-tiered.

Rates for Residential Users, as of July 18, 2019²⁸

Type of Charge	Urban	Rural/Seasonal
Service Charge	\$22.39/month	\$24.56/month
Energy Charge	11.18¢/kWh	11.18¢/kWh

Commercial and industrial rates employ a two-tiered, descending block system, with small commercial users charged 13.45¢/kWh for the first 5000kWh and 9.54¢/kWh thereafter.²⁹

Nova Scotia

Electricity in Nova Scotia are regulated by the Nova Scotia Utility and Review Board and distributed by Nova Scotia Power. For residential users, NSPower offers both a standard, single-tier plan (with a base charge of \$10.83/month and an energy charge of 15.603¢/kWh) and a time-of-use plan.³⁰ Commercial and industrial plans all generally feature two-tier, decreasing block rate structures.³¹

Newfoundland and Labrador

Electricity in Newfoundland and Labrador is regulated by the province’s Board of Commissioners of Public Utilities and is generally distributed by two utilities: Newfoundland Power (NP) and Newfoundland and Labrador Hydro (NLHydro).

²⁷ <http://www.hydroquebec.com/business/customer-space/rates/#base-rates>

²⁸ <https://www.nbpower.com/en/products-services/residential/rates>

²⁹ <https://www.nbpower.com/en/products-services/business/rates>

³⁰ <https://www.nspower.ca/en/home/about-us/electricity-rates-and-regulations/rates/domestic-service-tariff.aspx>; <https://www.nspower.ca/en/home/about-us/electricity-rates-and-regulations/rates/domestic-service-TOD.aspx>

³¹ <https://www.nspower.ca/en/home/myaccount/billing-and-payments/power-rates.aspx>

NLHydro's basic plan for residential users on insular Newfoundland include two tiers for basic monthly charges (0-200 amps/month and >200 amps/month, respectively) and a single-tiered fee for energy use (11.391¢/kWh as of March 1, 2019); additionally, NLHydro offers a seasonal residential plan.³² For the most part, NLHydro's commercial and industrial plans for insular Newfoundland offer lower kWh prices for higher use.³³

³² <https://nlhydro.com/wp-content/uploads/2019/05/May-23-2019-Schedule-of-Rates-Rules-and-Regulations.pdf>

³³ For more detail on electricity rates offered by NLHydro, including those available to Labrador residents, see "Newfoundland and Labrador Hydro: Schedule of Rates, Rules and Regulations." May 23, 2019. <https://nlhydro.com/wp-content/uploads/2019/05/May-23-2019-Schedule-of-Rates-Rules-and-Regulations.pdf>