

- 1 **Q. (Reference Application, Customer Service Continuity Plan, Figure 2, page 4) How**
 2 **do the figures in Figure 2 compare to other mid- to large distribution companies?**
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 4 A. Table 1 provides a comparison of Newfoundland Power's customer service costs to those
 5 of its US Peer Group for 1999 and 2019.¹

Table 1: Comparison of Customer Service Costs US Peer Group (000s)			
	1999	2019	Change
Newfoundland Power (CAD) ²	\$8,927	\$7,726	-13%
US Peer Group Average (USD) ³	\$19,056	\$28,817	51%

- 6 The average cost of providing customer service increased by approximately 51% among
 7 utilities in the US Peer Group from 1999 to 2019. This compares to a decrease of 13% in
 8 Newfoundland Power's customer service costs over the same period.

¹ Newfoundland Power's US Peer Group is based on the *Peer Group Performance Measures for Newfoundland Power* report filed with the Board annually. A total of 15 utilities in this peer group provided service in both 1999 and 2019. These utilities are included in the analysis. They are: Atlantic City Electric Company, Central Hudson Gas and Electric, Delmarva Power and Light Company, Duquesne Light Company, Green Mountain Power Corporation, Jersey Central Power and Light Company, Kingsport Power Company, Madison Gas and Electric Company, Metropolitan Edison Company, New York State Electric and Gas Corporation, Orange and Rockland Utilities, Inc., Rockland Electric Company, The Narragansett Electric Company, West Pen Power Company And Wheeling Power Company.

² Excludes costs associated with conservation programs and uncollectible bills.

³ Data for the US Peer Group is based on financial information available from the Federal Energy Regulatory Commission. Costs exclude uncollectible accounts and customer assistance expenses in both years to ensure comparability to Newfoundland Power's analysis.