

Requests for Information

1 NP-CA-012 **Reference: *Comments on Newfoundland Power’s 2022 Capital Budget***
2 ***Application*, Elenchus Research Associates Inc., August 13, 2021, page**
3 **24, Table 2 and page 27, Table 3.**
4
5 QUESTION: **Please provide an estimate of the annual operating and maintenance**
6 **costs over the full service life for all the hypothetical DER projects**
7 **listed in Table 2 and Table 3.**
8
9 RESPONSE: Elenchus has no basis for estimating the annual operating and maintenance
10 costs over the full service life for all the hypothetical DER projects listed in
11 Table 2 and Table 3. The illustrative examples contained in the Elenchus
12 report are not intended to be a quantitatively defensible comparison of
13 alternatives. The point being made is that if DER alternatives are “screened
14 out” prior to completing (or without presenting) the required steps to meet
15 the prudence review standards that have been identified by the PUB, in the
16 view of Elenchus NP’s evidence does not meet the stated prudence review
17 standards of the PUB.