

# Office of the Consumer Advocate

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October 12, 2021

Board of Commissions of Public Utilities  
120 Torbay Road, P.O. Box 2140  
St. John's, NL A1A 5B2

**Attention: G. Cheryl Blundon, Director of  
Corporate Services / Board Secretary**

Dear Ms. Blundon:

**RE: Newfoundland Power Inc. - 2022-2023 General Rate Application**

Further to the above-captioned, enclosed please find the original and ten (10) copies of the Consumer Advocate's Witness List and Issues List.

Yours truly,



Stephen Fitzgerald  
Counsel for Consumer Advocate

Encl.  
/bb

cc. **Newfoundland Power Inc.**  
Regulatory ([regulatory@newfoundlandpower.com](mailto:regulatory@newfoundlandpower.com))  
Dominic Foley ([dfoley@newfoundlandpower.com](mailto:dfoley@newfoundlandpower.com))  
Liam O'Brien ([lobrien@curtisdawe.com](mailto:lobrien@curtisdawe.com))  
**Newfoundland and Labrador Hydro**  
Regulatory ([NLHRegulatory@nlh.nl.ca](mailto:NLHRegulatory@nlh.nl.ca))  
Shirley Walsh ([shirleywalsh@nlh.nl.ca](mailto:shirleywalsh@nlh.nl.ca))  
**Board of Commissioners of Public Utilities**  
Jacqui Glynn ([jglynn@pub.nl.ca](mailto:jglynn@pub.nl.ca))  
Maureen Greene ([mgreene@pub.nl.ca](mailto:mgreene@pub.nl.ca))  
PUB Official Email ([ito@pub.nl.ca](mailto:ito@pub.nl.ca))

**IN THE MATTER OF** the *Electrical Power Control Act*, 1994 SNL 1994, Chapter E-5.1 (the “EPCA”) and the *Public Utilities Act*, RSNL 1990, Chapter P-47 (the “Act”), as amended, and regulations thereunder; and

**IN THE MATTER OF** a General Rate Application filed by Newfoundland Power Inc. to establish customer electricity rates for 2022 and 2023.


**CONSUMER ADVOCATE’S ISSUES LIST  
(Submitted October 12, 2021)**

In the Consumer Advocate’s submission, the issues arising in the proceeding are as follows:

1. Newfoundland Power’s proposal that the Board approve an overall average increase in current customer rates of 0.8% with effect from March 1, 2022.
2. Newfoundland Power’s proposed average rate base for 2022 of \$1,239,558,000 and for 2023 of \$1,289,405,000.
3. Newfoundland Power’s proposed rate of return on the average rate base for 2022 of 7.19% in the range of 7.01% to 7.3% and for 2023 of 6.97% in the range of 6.79 to 7.15%.
4. Newfoundland Power’s proposed revenue requirements from customer rate for 2022 of \$715,364,000 and for 2023 of \$712,803,000.
5. Newfoundland Power’s proposal for a rate of return in both 2022 and 2023 of 9.8% on a proposed common ratio equity of 45%.
6. Newfoundland Power’s proposed calculation of depreciation expense from January 1, 2022.

7. Newfoundland Power's proposed revisions to its GEC calculation effective January 1, 2023.
8. Conservation and Demand Management issues and programming.
9. Operating expenses, including advertising and charitable donations.
10. Inter-company transactions.
11. Executive Compensation.
12. Short-Term Incentive ("STI") programs.
13. Any proposed increase of rates, tolls and charges for any rate class.
14. Such other issues as may arise.

**DATED** at St. John's, Newfoundland and Labrador, this 12<sup>th</sup> day of October, 2021.

Per:   
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**Stephen Fitzgerald**  
**Counsel for the Consumer Advocate**  
Terrace on the Square, Level 2, P.O. Box 23135  
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**IN THE MATTER OF** a General Rate Application Filed by Newfoundland Power Inc. to establish customer electricity rates for 2022 and 2023.

**CONSUMER ADVOCATE’S WITNESS LIST  
(October 12, 2021)**

The Consumer advocate currently expects he may call the following witnesses in this proceeding:

1. Dr. Laurence D. Booth.

The Consumer advocate reserves the right to call further or other witnesses as he considers appropriate to address issues or matters arising.

**DATED** at St. John’s, Newfoundland and Labrador, this 12<sup>th</sup> day of October, 2021.

Per:

  
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**Stephen Fitzgerald**

**Counsel for the Consumer Advocate**

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