Reference: "2022/2023 General Rate Application," Newfoundland Power, May 27, 1 Q. 2 2021, Volume 2, Report 6, Section 2.3, Page 4 of 13. 3 4 Newfoundland Power's evidence states: 5 6 The average capitalization rate of surveyed utilities was 10%. 7 8 Newfoundland Power's capitalization rate is comparable to that of other 9 utilities. Excluding pension costs, the Company's overall capitalization rate was 9% in 2019. 10 11 12 Please confirm that only one utility surveyed indicated that they used the 'Burden Rate' method. Please also confirm that the utility that used the 'Burden Rate' had a 13 14 capitalization rate of 26% which was greater than twice the capitalization rate of 15 any of the other utilities surveyed. 16 17 Newfoundland Power can confirm that 1 utility surveyed indicated the use of a Burden A. 18 Rate methodology to capitalize overhead construction costs and indicated it had a capitalization rate of 26%.1 19 20 Newfoundland Power observes the median capitalization rate of surveyed utilities was 21 22  $10\%.^{2}$ 

See the 2022/2023 General Rate Application, Volume 2, Supporting Materials, Tab 6, Review of General Expenses Capitalized, Attachment 1, Appendix E, page E-3, Questions 5, 6 and 7 for all responses related to capitalized overheads.

The mode of the responses was also 10%. See the 2022/2023 General Rate Application, Volume 2, Supporting Materials, Tab 6, Review of General Expenses Capitalized, Attachment 1, Appendix E, page E-3, Question 7.