1 Q. Reference: "2024 Rate of Return on Rate Base Application", Newfoundland Power 2 Inc., November 23, 2023, app. B. 3 4 In Board Order No. P.U. 16 (2019), the Board of Commissioners of Public Utilities 5 approved Newfoundland and Labrador Hydro's application to increase rate base 6 outside of a test year. 7 8 Hydro shall continue to use the currently approved method to determine rate 9 base, including beginning-of-year and end-of-year averaging for capital 10 assets in service. Hydro may apply to the Board for a different treatment of significant capital additions on a case-by-case basis. 11 12 13 a) Please explain why it is appropriate for Newfoundland Power to receive an 14 increase to the total rate base outside of a test year. b) Please provide a listing of utilities across Canada that receive an adjustment to 15 average rate base outside of a test year. 16 c) Please provide supporting analysis that receiving an increase to total rate base 17 outside of a test year is consistent with utility practice across Canada. 18 19 20 In Order No. P.U. 3 (2022), the Board ordered, among other things, that A. a) Newfoundland Power file an application on or before November 15, 2023 for 21 22 approval of the Company's 2024 forecast average rate base and rate of return on rate base, maintaining the common equity ratio and return on common equity 23 accepted for rate setting in that order.1 24 25 Newfoundland Power's application is filed in compliance with the Board's order.<sup>2</sup> 26 27 28 b) See the response to Request for Information PUB-NP-004 for the results of a jurisdictional scan of investor-owned utilities in Canada to determine how customer 29 30 rates are adjusted between test years. 31 32

c) See part b).

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See Order No. P.U. 3 (2022), page 20, lines 17-20.

With respect to revisions to customer rates outside of a test year, the Board has recognized that such revisions may be required based on the approval of a new rate of return on rate base in the year subsequent to a test year. For example, see Order No. P.U. 13 (2013) wherein the Board provided that the Company may file for approval of a revised Schedule of Rates, Tolls and Charges to reflect the revisions required to its 2015 rate of return on rate base by that order.