

1 **Q. Reference: Newfoundland Power’s responses to NLH-NP-003 and PUB-NP-005 of**
2 **this proceeding**

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4 **In its response to PUB-NP-005 Newfoundland Power stated:**

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6 **In Newfoundland Power’s view, these results show that the Company**
7 **had an opportunity to earn a just and reasonable return based on the**
8 **customer rates in effect during each of the years 2013 through 2023.**

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10 **Newfoundland and Labrador Hydro observes that with the exception of two years**
11 **between 2013 and 2023 where Newfoundland Power was marginally below the**
12 **midpoint, Newfoundland Power’s rate of return on rate base during that period was**
13 **either at or above the midpoint.**

14 **a) In Newfoundland Power’s view, what is the purpose of the Board of**
15 **Commissioners of Public Utilities providing a range of return?**

16 **b) Given that Newfoundland Power is within its approved range of return (6.21%)**
17 **before the cost recovery proposed within this application is applied, does**
18 **Newfoundland Power believe that it has the opportunity to earn a just and**
19 **reasonable return based on customer rates without the proposed cost recovery?**
20 **Why or why not?**

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22 **A. a) See response to Request for Information CA-NP-019.**

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24 **b) See response to Request for Information CA-NP-012.**