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March 21, 2024

Board of Commissioners of Public Utilities Prince Charles Building 120 Torbay Road, P.O. Box 21040 St. John's, NL A1A 5B2

Attention: Jo-Anne Galarneau

Executive Director and Board Secretary

Re: Newfoundland Power Inc.'s 2025–2026 General Rate Application – Requests for Information

Please find enclosed Newfoundland and Labrador Hydro's requests for information NLH-NP-099 to NLH-NP-134 in relation to Newfoundland Power Inc.'s 2025–2026 General Rate Application.

Should you have any questions, please contact the undersigned.

Yours truly,

NEWFOUNDLAND AND LABRADOR HYDRO

Shirley A. Walsh

Senior Legal Counsel, Regulatory SAW/kd

Encl.

ecc:

Board of Commissioners of Public Utilities

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International Brotherhood of Electrical Workers, Local 1620

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Newfoundland Power Inc.

Dominic J. Foley Lindsay S.A. Hollett Liam P. O'Brien, Curtis Dawe Regulatory Email **IN THE MATTER OF** the *Public Utilities Act*, RSNL 1990, Chapter P-47, as amended ("*Act*"); and

IN THE MATTER OF an application by Newfoundland Power Inc. ("Newfoundland Power") to establish customer electricity rates for 2025 and 2026 ("Application").

Newfoundland and Labrador Hydro

Requests for Information

NLH-NP-099 to NLH-NP-134

March 21, 2024

| 1 | SECTION 1: | INTRODUCTION |
|----------------|------------|---|
| 2 | NLH-NP-099 | Reference: NLH-NP-005 |
| 3 | | Please confirm the ratio, in dollars, of Newfoundland Power's capital spend on renewal |
| 4 | | asset class to its operational spending on maintenance for each year shown in Figure 1. |
| 5 | NLH-NP-100 | Reference: NLH-NP-006 |
| 6 | | What percentage of the reduction in real operating cost per customer is attributable to |
| 7 | | customer growth? Assuming the same number of customers in 2013 and 2022, please |
| 8 | | provide the growth rate percentage. |
| 9 | NLH-NP-101 | Reference: PUB-NP-003 |
| 10 | | In its response to PUB-NP-003, Newfoundland Power states: |
| 11 12 13 | | it is assumed that the cost recovery of \$11.8 million proposed in the 2024 Rate of Return on Rate Base Application would be recovered through customer rates beginning July 1, 2025. |
| 14 | | a) What is the basis for Newfoundland Power's assumption of the cost recovery of |
| 15 | | \$11.8 million in customer rates beginning July 1, 2025? |
| 16 | | b) Please restate Table 1 to exclude recovery of the \$11.8 million shortfall. |
| 17 | NLH-NP-102 | Reference: CA-NP-004 and CA-NP-031 |
| 18 | | Please provide samples of questions related to electricity prices and reliability used in |
| 19 | | recent customer surveys that help Newfoundland Power "identify areas of concern to |
| 20 | | customers, such as the cost and reliability of electricity service." |
| 21 | SECTION 2: | CUSTOMER OPERATIONS/OPERATING COSTS |
| 22 | NLH-NP-103 | Reference: NLH-NP-007 and NLH-NP-011 |
| 23 | | In its response to NLH-NP-007, Newfoundland Power noted that technological advances |
| 24 | | have meant to provide savings; however, Hydro observes that based on Figure 1 in |
| 25 | | Newfoundland Power's response to NLH-NP-011, costs have remained flat. |
| 26 | | a) Why has there been no reduction in inflation-adjusted operating cost per |
| 27 | | customer since 2016, given that Newfoundland Power has undertaken the |
| 28 | | Application Enhancements Project described in the response to NLH-NP-007? |

| 1 | | b) Why does Newfoundland Power not project any reduction in inflation-adjusted |
|----|------------|--|
| 2 | | operating cost per customer between 2024 and 2026? |
| 3 | NLH-NP-104 | Reference: NLH-NP-019 |
| 4 | | How has Newfoundland Power determined that use of third-party software is least cost |
| 5 | | for customers? |
| 6 | NLH-NP-105 | Reference: NLH-NP-020 |
| 7 | | a) Are the costs associated with the changes in upcoming accounting standards |
| 8 | | recurring or project-specific? |
| 9 | | b) Please explain why it is appropriate to include these costs in a test year. |
| 10 | NLH-NP-106 | Reference: NLH-NP-024 |
| 11 | | a) Where Newfoundland Power utilizes a three-year average to determine |
| 12 | | budgets, what years are included in the three-year average? Please confirm the |
| 13 | | number of months within the forecast if 2023 is used. |
| 14 | | b) Please provide the calculation for the overtime in each forecast year (i.e., the |
| 15 | | last three years' history, average, and labour inflation rate). |
| 16 | NLH-NP-107 | Reference: NLH-NP-030 |
| 17 | | Starting with 2022 actual non-labour costs, please calculate estimates for 2023–2026 by |
| 18 | | inflating the 2022 costs using the actual GDP deflator rates for 2023 and the projected |
| 19 | | GDP deflator rates for 2024–2026. Please detail the calculation and rates used. If the non |
| 20 | | labour costs provided in Exhibits 1 and 2 exceed the amounts provided in this calculation |
| 21 | | please detail the reasons for the increase. |
| 22 | NLH-NP-108 | Reference: NLH-NP-028 and NLH-NP-036 |
| 23 | | Similar to Table 1 provided in Newfoundland Power's response to NLH-NP-028, please |
| 24 | | provide a detailed breakdown of the increase from 2022 Actual to 2026 Forecast and a |
| 25 | | specific explanation of costs included in each category listed in NLH-NP-036: |
| 26 | | i) Vehicle expenses; |
| 27 | | ii) Travel; |

| 1 | | iii) Miscellaneous; |
|----|------------|---|
| 2 | | iv) Education, Training and Employee Fees; and |
| 3 | | v) Vegetation Management. |
| 4 | NLH-NP-109 | Reference: NLH-NP-036 |
| 5 | | a) What was Newfoundland Power's three-year average for travel expenses from |
| 6 | | 2017 to 2019 prior to COVID-19 restrictions? |
| 7 | | b) What was Newfoundland Power's three-year average for training costs from |
| 8 | | 2017 to 2019 prior to COVID-19 restrictions? |
| 9 | NLH-NP-110 | Reference: NLH-NP-037, Attachment A |
| 10 | | Why did the miscellaneous intercorporate charges from affiliates increase significantly in |
| 11 | | the 2025 Test Year and the 2026 Test Year from the 2023 Test Year? |
| 12 | NLH-NP-111 | Reference: NLH-NP-047 |
| 13 | | What is driving the increase of approximately 12 full-time equivalents in the 2026 Forecast |
| 14 | | from the 2023 Test Year in Engineering and Operations? |
| 15 | NLH-NP-112 | Reference: PUB-NP-022 |
| 16 | | a) For each cost category within computing equipment and software listed in |
| 17 | | Attachment A, please provide an explanation of the types of costs included in |
| 18 | | each line and how they are allocated to each category. |
| 19 | | b) Further to part a), please provide a detailed breakdown of the computing |
| 20 | | equipment and software costs by software application/hardware/vendor and |
| 21 | | explain the drivers for increases in costs from the 2023 Test Year to the |
| 22 | | 2026 Test Year in the following categories: |
| 23 | | i) Infrastructure and Network Management; |
| 24 | | ii) Cybersecurity Management; |
| 25 | | iii) Customer Service Software; |
| 26 | | iv) Business Back Office Software; and |
| 27 | | v) Operations and Engineering Software |

| 1 | | c) In its response to PUB-NP-022, Newfoundland Power states "Other company fees |
|--|------------|--|
| 2 | | primarily relate to the Customer Information System and security information |
| 3 | | and event management." In a format similar to Table 1 provided in the response |
| 4 | | to NLH-NP-028, please provide the specific costs associated with each |
| 5 | | component and explain the nature of these expenditures. |
| 6 | NLH-NP-113 | Reference: PUB-NP-027 |
| 7 | | Does Newfoundland Power undertake research on a recurring basis of the most cost |
| 8 | | effective and preferred methods to communicate with customers on outages? |
| 9 | NLH-NP-114 | Reference: PUB-NP-029 |
| 10 | | Based on Table 4 (including 2023 Actuals), please provide the total short-term incentive |
| 11 | | payment by position made to the CEO, executives, and directors per year, the percentage |
| 12 | | payout of base salary, as well as the breakdown between regulated and non-regulated |
| 13 | | costs. |
| 14 | SECTION 2: | CUSTOMER OPERATIONS/CAPITAL EXPENDITURES |
| 17 | SECTION 2. | COSTONIER OF ERATIONS/ CALITIZE EXICENDITIONES |
| 15 | NLH-NP-115 | Reference: PUB-NP-046 |
| | | |
| 15 | | Reference: PUB-NP-046 |
| 15 16 | | Reference: PUB-NP-046 Further to Table 1 in Newfoundland Power's response to PUB-NP-046, please restate |
| 15 16 17 | | Reference: PUB-NP-046 Further to Table 1 in Newfoundland Power's response to PUB-NP-046, please restate Table 1 to include all Atlantic Canada utilities (i.e., New Brunswick Power, Newfoundland |
| 15 16 17 18 | NLH-NP-115 | Reference: PUB-NP-046 Further to Table 1 in Newfoundland Power's response to PUB-NP-046, please restate Table 1 to include all Atlantic Canada utilities (i.e., New Brunswick Power, Newfoundland and Labrador Hydro). |
| 15 16 17 18 | NLH-NP-115 | Reference: PUB-NP-046 Further to Table 1 in Newfoundland Power's response to PUB-NP-046, please restate Table 1 to include all Atlantic Canada utilities (i.e., New Brunswick Power, Newfoundland and Labrador Hydro). Reference: PUB-NP-055 |
| 15 16 17 18 19 20 | NLH-NP-115 | Reference: PUB-NP-046 Further to Table 1 in Newfoundland Power's response to PUB-NP-046, please restate Table 1 to include all Atlantic Canada utilities (i.e., New Brunswick Power, Newfoundland and Labrador Hydro). Reference: PUB-NP-055 a) Please update Table 1 to include 2020–2023 Actuals. |
| 15 16 17 18 19 20 21 22 | NLH-NP-115 | Reference: PUB-NP-046 Further to Table 1 in Newfoundland Power's response to PUB-NP-046, please restate Table 1 to include all Atlantic Canada utilities (i.e., New Brunswick Power, Newfoundland and Labrador Hydro). Reference: PUB-NP-055 a) Please update Table 1 to include 2020–2023 Actuals. b) Please provide a similar table documenting capital additions from 2020 Actuals to 2026 Existing. |
| 15 16 17 18 19 20 21 | NLH-NP-115 | Reference: PUB-NP-046 Further to Table 1 in Newfoundland Power's response to PUB-NP-046, please restate Table 1 to include all Atlantic Canada utilities (i.e., New Brunswick Power, Newfoundland and Labrador Hydro). Reference: PUB-NP-055 a) Please update Table 1 to include 2020–2023 Actuals. b) Please provide a similar table documenting capital additions from 2020 Actuals |
| 15 16 17 18 19 20 21 22 23 | NLH-NP-115 | Reference: PUB-NP-046 Further to Table 1 in Newfoundland Power's response to PUB-NP-046, please restate Table 1 to include all Atlantic Canada utilities (i.e., New Brunswick Power, Newfoundland and Labrador Hydro). Reference: PUB-NP-055 a) Please update Table 1 to include 2020–2023 Actuals. b) Please provide a similar table documenting capital additions from 2020 Actuals to 2026 Existing. c) Please provide an explanation on the following depreciation increases from the |
| 15 16 17 18 19 20 21 22 23 24 | NLH-NP-115 | Reference: PUB-NP-046 Further to Table 1 in Newfoundland Power's response to PUB-NP-046, please restate Table 1 to include all Atlantic Canada utilities (i.e., New Brunswick Power, Newfoundland and Labrador Hydro). Reference: PUB-NP-055 a) Please update Table 1 to include 2020–2023 Actuals. b) Please provide a similar table documenting capital additions from 2020 Actuals to 2026 Existing. c) Please provide an explanation on the following depreciation increases from the 2023 Test Year to the 2026 Existing: |

| 1 | | iv) Software – 21% increase. |
|------------|------------|---|
| 2 | | d) Please articulate how retirement of assets are projected in forecast periods |
| 3 | | from 2023 Test Year to 2026 Existing. |
| 4 | | e) Please provide the value of retired assets from 2020 to 2026 Existing. |
| 5 | SECTION 2: | CUSTOMER OPERATIONS/RELIABILITY |
| 6 | NLH-NP-117 | Reference: NLH-NP-050 |
| 7 | | In its response to NLH-NP-050, Newfoundland Power states: |
| 8 9 | | In Newfoundland Power's view, SAIFI performance is most reflective of the condition of the electrical system. |
| LO | | a) Is Newfoundland Power's view that System Average Interruption Frequency |
| l1 | | Index ("SAIFI") performance is most reflective of the condition of the electric |
| L2 | | system consistent with industry best practice? Please provide any supporting |
| L3 | | industry documentation. |
| L4 | | b) If SAIFI is reflective of the condition of the electrical system, what metrics or |
| L 5 | | operational philosophies, in Newfoundland Power's view, is System Average |
| L6 | | Interruption Duration Index reflective of? |
| L7 | NLH-NP-118 | Reference: NLH-NP-050 |
| 18 | | In its response to NLH-NP-050, Newfoundland Power states: |
| 19 20 | | In Newfoundland Power's view, better reliability performance does not directly translate to higher costs; and |
| 21 22 | | As such, there are no incremental costs to customers to continue receiving current levels of reliability. |
| 23 | | a) Does Newfoundland Power agree that reliability performance, as measured I |
| 24 | | System Average Interruption Duration Index ("SAIDI") and System Average |
| 25 | | Interruption Frequency Index ("SAIFI"), is generally correlated with the level |
| 26 | | utility investment? |

| 1 | | b) Does Newfoundland Power agree that it is generally accepted within the ut | tility |
|--|--------------------------|--|--------|
| 2 | | industry that SAIDI and SAIFI are generally correlated with the level of utilit | У |
| 3 | | investment? | |
| 4 | | c) Does Newfoundland Power have any financial analysis to support the | |
| 5 | | statements above made in response to NLH-NP-050? If so, please provide. | |
| 6 | NLH-NP-119 | Reference: CA-NP-054 | |
| 7 | | In its response to CA-NP-054, Newfoundland Power states: | |
| 8 9 10 | | This primarily reflects the fact that national standards require Newfoundland Power's electrical system to be built to a higher standard than utilities in the Maritime Provinces. | |
| 11 | | Please detail how differences in design standards contribute to disparity in System | |
| 12 | | Average Interruption Duration Index as opposed to System Average Interruption | |
| 13 | | Frequency Index. | |
| | | | |
| 14 | SECTION 3: | FINANCE/FAIR RETURN | |
| 14 15 | SECTION 3: NLH-NP-120 | FINANCE/FAIR RETURN Reference: NLH-NP-062 | |
| | | | |
| 15 | | Reference: NLH-NP-062 | |
| 15 16 17 18 | | Reference: NLH-NP-062 In its response to NLH-NP-062, Newfoundland Power states: A fair return on equity provides the Company the ability to attract incremental capital on reasonable terms and conditions, which benefits | |
| 15 16 17 18 19 | | Reference: NLH-NP-062 In its response to NLH-NP-062, Newfoundland Power states: A fair return on equity provides the Company the ability to attract incremental capital on reasonable terms and conditions, which benefits customers. | |
| 15 16 17 18 19 20 | | Reference: NLH-NP-062 In its response to NLH-NP-062, Newfoundland Power states: A fair return on equity provides the Company the ability to attract incremental capital on reasonable terms and conditions, which benefits customers. a) Has Newfoundland Power had any difficulty to date attracting incremental | |
| 15 16 17 18 19 20 21 | | Reference: NLH-NP-062 In its response to NLH-NP-062, Newfoundland Power states: A fair return on equity provides the Company the ability to attract incremental capital on reasonable terms and conditions, which benefits customers. a) Has Newfoundland Power had any difficulty to date attracting incremental capital on reasonable terms based on the current equity structure of 45% and the current equity st | |
| 15 16 17 18 19 20 21 22 | | Reference: NLH-NP-062 In its response to NLH-NP-062, Newfoundland Power states: A fair return on equity provides the Company the ability to attract incremental capital on reasonable terms and conditions, which benefits customers. a) Has Newfoundland Power had any difficulty to date attracting incremental capital on reasonable terms based on the current equity structure of 45% a Return on Equity ("ROE") of 8.5%? | ind a |
| 15 16 17 18 19 20 21 22 | | Reference: NLH-NP-062 In its response to NLH-NP-062, Newfoundland Power states: A fair return on equity provides the Company the ability to attract incremental capital on reasonable terms and conditions, which benefits customers. a) Has Newfoundland Power had any difficulty to date attracting incremental capital on reasonable terms based on the current equity structure of 45% a Return on Equity ("ROE") of 8.5%? b) In Newfoundland Power's opinion, is the benefit to customers from | ind a |
| 15 16 17 18 19 20 21 22 23 24 | | Reference: NLH-NP-062 In its response to NLH-NP-062, Newfoundland Power states: A fair return on equity provides the Company the ability to attract incremental capital on reasonable terms and conditions, which benefits customers. a) Has Newfoundland Power had any difficulty to date attracting incremental capital on reasonable terms based on the current equity structure of 45% at Return on Equity ("ROE") of 8.5%? b) In Newfoundland Power's opinion, is the benefit to customers from Newfoundland Power's ability to attract incremental capital on reasonable | ind a |
| 15 16 17 18 19 20 21 22 23 24 25 | | Reference: NLH-NP-062 In its response to NLH-NP-062, Newfoundland Power states: A fair return on equity provides the Company the ability to attract incremental capital on reasonable terms and conditions, which benefits customers. a) Has Newfoundland Power had any difficulty to date attracting incremental capital on reasonable terms based on the current equity structure of 45% a Return on Equity ("ROE") of 8.5%? b) In Newfoundland Power's opinion, is the benefit to customers from Newfoundland Power's ability to attract incremental capital on reasonable terms and conditions, when compared to the costs of the rate increases | and a |

| 1 | NLH-NP-121 | Reference: NLH-NP-065 and PUB-NP-007, Attachment A |
|----|------------|---|
| 2 | | Further to Table 1 in Newfoundland Power's response to NLH-NP-065, please restate |
| 3 | | Table 1 to assume the rate structure proposed in the illustrative example within |
| 4 | | Attachment A of Newfoundland Power's response to PUB-NP-007 was implemented |
| 5 | | January 1, 2024. |
| 6 | NLH-NP-122 | Reference: NLH-NP-088 |
| 7 | | a) In the determination of the 30-year risk free rate, a forecast of a 10-year yield |
| 8 | | was used as of April 2023, a time when yields were heavily inverted, and adding |
| 9 | | the historical positive spread between the 10 and 30 year yield which, in theory, |
| 10 | | would result in a much higher rate. What would the 30-year risk free rate be if a |
| 11 | | 30-year benchmark forecast was used in the calculation during the same |
| 12 | | period? |
| 13 | | b) Please explain the interpretation of the lower R-square values of the monthly |
| 14 | | beta in comparison to the weekly beta in Table 2? |
| 15 | | c) Regarding the t-statistic for weekly and monthly beta, please provide the |
| 16 | | underlying data and calculations in an excel format. |
| 17 | | d) Please provide the capital structures of the North American electric proxy |
| 18 | | group. Please provide the percentage of their revenues and net income derived |
| 19 | | from the regulated businesses. How are adjustments being made for the |
| 20 | | reduced risk of a highly regulated entity such as Newfoundland Power? |
| 21 | | e) Please provide an estimate of the Canadian equity market risk premium. |
| 22 | NLH-NP-123 | Reference: PUB-NP-063 |
| 23 | | Please provide the credit ratings for all comparators in Figure 19 and 33 of the Concentric |
| 24 | | Report. For each utility, please identify whether the credit rating is higher or lower than |
| 25 | | Newfoundland Power. |

| 1 | SECTION 3: | FINANCE/DEMAND MANAGEMENT INCENTIVE ACCOUNT |
|----|------------|---|
| 2 | NLH-NP-124 | Reference: NLH-NP-073, NLH-NP-074, and NLH-NP-075 |
| 3 | | a) Please update Table 2 in Newfoundland Power's response to NLH-NP-075 for |
| 4 | | 2013–2023 to include: |
| 5 | | i) Test Year Demand Cost and Actual Demand Cost; |
| 6 | | ii) Test Year Energy Purchases and Actual Energy Purchases; |
| 7 | | iii) Test Year Billing Demand and Actual Billing Demand; |
| 8 | | iv) Demand Supply Cost Variance; |
| 9 | | v) Demand Management Incentive ("DMI") threshold (show the threshold |
| 10 | | as a positive or negative impact on net income); and |
| 11 | | vi) Amount credited or charged to customers through the DMI Account. |
| 12 | | b) Does the current operation of the DMI Account provide an incentive for |
| 13 | | Newfoundland Power to undertake reasonable initiatives to minimize peak |
| 14 | | demand? |
| 15 | | c) Would Newfoundland Power support a change to its DMI Account to specifically |
| 16 | | incentivize the company to meet or exceed demand management activities |
| 17 | | within its control such as voltage management, customer curtailment, and |
| 18 | | Conservation and Demand Management activities? Why or why not? |
| 19 | SECTION 4: | RATE BASE AND REVENUE REQUIREMENT |
| 20 | NLH-NP-125 | Reference: NLH-NP-078 |
| 21 | | Please update the rate increases provided to reflect a Newfoundland Power Return on |
| 22 | | Equity of: |
| 23 | | i) 8.75%; and |
| 24 | | ii) 9.0%. |
| 25 | NLH-NP-126 | Reference: NLH-NP-080 |
| 26 | | As per Table 1 in the response to NLH-NP-080, Newfoundland Power will save |
| 27 | | \$3.088 million and \$9.391 million in purchased power costs due to lower purchases |

| 1 | | associated with elasticity impacts. As per Appendix C of the Customer, Energy and |
|----|------------|---|
| 2 | | Demand Report, elasticity is reducing demand from 1,338.74 MW to 1,334.811 MW in |
| 3 | | 2025, and 1,336.847 MW to 1,325.188 MW in 2026. As per Table 1, the reduction in |
| 4 | | purchased power costs are calculated using the tail block energy rate only. |
| 5 | | Please explain why the reduction in demand is not factored in the reduced power supply |
| | | |
| 6 | | cost of \$9.391 million as shown in Exhibit 7. |
| 7 | NLH-NP-127 | Reference: NLH-NP-081 |
| 8 | | In the response to NLH-NP-081, Newfoundland Power indicated that their rate increase |
| 9 | | would be 9.5% if their purchased power costs were rebased and new elasticity impacts |
| 10 | | were incorporated. This is a 0.3% decrease from the 9.8% originally presented in Scenario |
| 11 | | B, when the rebased revenue requirement contained elasticity impacts relating to a 5.5% |
| 12 | | rate increase. |
| 13 | | a) Please confirm that if Newfoundland Power's costs were to be rebased and it |
| 14 | | needed to propose a higher rate increase, Newfoundland Power would not ask |
| 15 | | for additional revenue in their elasticity adjustment beyond the amounts |
| 16 | | provided in Exhibit 9 of the 2025/2026 General Rate Application. |
| 17 | | b) If Newfoundland Power is unable to confirm, then how much additional revenue |
| 18 | | would Newfoundland Power request to add to their revenue elasticity |
| 19 | | adjustment? |
| 20 | SECTION 5: | CUSTOMER RATES |
| 21 | NLH-NP-128 | Reference: PUB-NP-083, Footnote 9 |
| | | |
| 22 | | Please breakdown the estimated revenue requirement which demonstrates the |
| 23 | | \$10 million shortfall of costs included in footnote 9. |
| 24 | NLH-NP-129 | Reference: CA-NP-102, Attachment A |
| 25 | | Please append the Return on Rate Base for 2025PF and 2026PF within Attachment A. |

| 1 | VOLUME 2: | COST OF SERVICE |
|----|------------------|--|
| 2 | NLH-NP-130 | Reference: NLH-NP-084 |
| 3 | | Please provide a calculation of the 8.36% Return on Rate Base and how it was used in |
| 4 | | determining the required rate change. |
| 5 | VOLUME 2: | CUSTOMER, ENERGY AND DEMAND FORECAST |
| 6 | NLH-NP-131 | Reference: NLH-NP-002, and PUB-NP-097 |
| 7 | | a) In reference to Table 3 in Newfoundland Power's response to PUB-NP-097, |
| 8 | | please provide the forecast demand impact per customer by year. How does |
| 9 | | this forecast demand impact compare to Newfoundland Power's average |
| 10 | | domestic customer diversified peak demand? |
| 11 | | b) Please provide the data in Table 1 of Newfoundland Power's response to |
| 12 | | NLH-NP-002 by customer class. |
| 13 | NLH-NP-132 | Reference: CA-NP-140 |
| 14 | | What does Newfoundland Power consider to be "rate shock" for customers? |
| 15 | VOLUME 2: | COST OF CAPITAL REPORT |
| 16 | NLH-NP-133 | Reference: NLH-NP-085 and PUB-NP-124 |
| 17 | | a) Are the companies listed in Figure 33 of Newfoundland Power's response to |
| 18 | | PUB-NP-124 also competing in the same markets for investment that |
| 19 | | Newfoundland Power is? Why or why not? |
| 20 | | b) Where are Newfoundland Power's five primary investors located? |
| 21 | NLH-NP-134 | Reference: NLH-NP-089 and PUB-NP-070 |
| 22 | | In request for information NLH-NP-089, part b) Newfoundland and Labrador Hydro asked |
| 23 | | if there are any storm-related costs built into Newfoundland Power's 2025/2026 Test Yea |
| 24 | | forecast. Newfoundland Power replied by referring to its response to PUB-NP-070, but |
| 25 | | that response does not address the test year forecasts. Please identify the specific |
| 26 | | amounts included within the 2025 Test Year and 2026 Test Year forecasts that are related |
| 27 | | to storm events. |

DATED at St. John's, in the province of Newfoundland and Labrador this 21st day of March, 2024.

Shirley A. Walsh

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