

1 **Volume 2: Cost of Service Study**  
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3 **Q. With respect to the MUN-T2 Transformer Replacement application, on page 5 of**  
4 **the Board's Response to the Consumer Advocate's Request for an Oral Hearing, the**  
5 **Board states "*Newfoundland Power's current cost of service was reviewed in its last***  
6 ***general rate application filed in 2021 and approved in 2022 and was the subject of an***  
7 ***agreement of all of the parties in that proceeding, including the Consumer Advocate.*"**  
8 **At the time, the Consumer Advocate's position was that the cost of service study was**  
9 **far out of date as it was based on load research data completed in 2006, now 18**  
10 **years old. For this reason, the Consumer Advocate successfully negotiated that**  
11 **Newfoundland Power undertake a load research study as part of the settlement**  
12 **agreement that the Board references. Newfoundland Power's load research study**  
13 **although far out of date, was the best information available at that time. As noted in**  
14 **NP' s Load Research Study Plan dated June 15, 2023, "*This Load Research Study***  
15 ***Plan is a direct result of NP 's need to initiate a new load research study.*" Relating to**  
16 **the purpose of the study, the report goes on to say "*When completed, the 2023 Load***  
17 ***Research Study will be used in NP 's future cost of service studies, ... .*" Does**  
18 **Newfoundland Power agree that the current cost of service study and the cost of**  
19 **service study undertaken for the 2022-23 GRA are based on outdated load research**  
20 **data?**

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22 **A. See the response to Request for Information CA-NP-105.**