1 2	Section	on 2:	Customer Operations/Capital Expenditures					
3	Q.	Reference: "2025/2026 General Rate Application," Newfoundland Power Inc.,						
4			December 12, 2023, vol. 1, Evidence, sec. 2.4.1, p. 2-35, Table 2-9.					
5 6		a)	Please provide a table similar to Table 2-9 for capital labour costs by year for 2022 to 2026 Forecast including 2023 Actuals and 2022 and 2023 Test Years.					
7		b)	Please provide a table similar to Table 2-9 for external (contractor) labour costs					
8 9			by year for 2022 to 2026 Forecast including 2023 Actuals and 2022 and 2023 Test Years. Please show Operating and Capital labour costs separately.					
10 11		c)	How does Newfoundland Power determine whether the use of internal or external labour is least cost to customers?					
12 13 14	A.	a)	See Attachment A for the requested information.					
15 16		b)	See Attachment A for the requested information.					
17 18 19 20 21		c)	Newfoundland Power manages its workforce to allow it to meet the operational requirements of the Company. The Company may utilize external labour where the required skillset or specialized knowledge is not available or the level of required resourcing is not available within its current workforce.					
22 23 24 25			Utilizing external labour to bridge this gap allows the Company to have the flexibility to utilize its workforce as required during the year. This allows the Company to align its resourcing requirement with the timing of the required work to ensure this work is completed at least cost to customers.					

Labour Costs by Breakdown 2022 to 2026 Forecast

## Newfoundland Power Inc. Labour Costs by Breakdown - Capital 2022 to 2026 Forecast (\$000s)

	2022TY	2023TY	2022A	2023A	2023F	2024F	2025F	2026F
Regular and Standby	29,006	27,972	24,635	29,059	30,019	28,368	29,576	30,873
Temporary	-	-	413	998	-	-	-	-
Overtime	-	-	1,924	2,601	-	-	-	-
Total	29,006	27,972	26,972	32,658	30,019	28,368	29,576	30,873

## Newfoundland Power Inc. Labour Costs by Breakdown - Contractors 2022 to 2026 Forecast (\$000s)

	2022TY	2023TY	2022A	2023A	2023F	2024F	2025F	2026F
Operating	-	-	-	-	-	-	-	-
Capital	15,602	16,046	16,446	21,912	16,502	16,923	17,164	17,433
Total	15,602	16,046	16,446	21,912	16,502	16,923	17,164	17,433