customers.

Volume 2: Cost of Capital: Expert Opinion of James Coyne-Capital Structure and Risk **Profile** 

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**Cost of Capital Report states:** One of the most important operating risks for Newfoundland Power is weather-related service disruptions. As described in the Company's risk evidence, Newfoundland Power's service territory is characterized by the most severe ice and wind conditions in the populated regions of Canada. The need to address service disruptions caused by severe weather conditions involves unanticipated and potentially volatile capital and operating costs. Newfoundland Power's capital structure and allowed ROE should provide

the Company with the financial flexibility necessary to respond to unforeseen

capital and operating costs in order to restore electric service promptly to

Reference: "2025/2026 General Rate Application," Newfoundland Power Inc.,

Advisors Inc., November 7, 2023, ch. VI(B)(2)(e), p. 66/12–19.

December 12, 2023, vol. 2, Expert Evidence, "Cost of Capital," Concentric Energy

- a) Please provide storm-related costs, Operating and Capital, since 2010 and explanations per year of how these costs impacted the company's ability to earn a fair return. Please include a listing of applicable storm dates and data.
- b) Are there any storm-related costs built into Newfoundland Power's 2025/2026 **Test Year Forecast?**
- c) Has Newfoundland Power ever applied to the Board of Commissioners of Public Utilities to defer significant storm-related operating costs? Would applying to defer for future recovery be an option to alleviate this risk, if significant operating costs occurred? Why or why not?
- a) See the response to Request for Information PUB-NP-070 for the requested storm-related costs and how those costs impacted the Company's financial position.
  - Table 1 provides a listing of major events for 2010 to 2012. For a listing of major events since 2013, see the response to Request for Information CA-NP-053.

## Table 1: **Major Events** 2010 to 2012

Year	Event	Start Date	Duration
2010	Sleet Storm	4-Mar	7 days
2010	Hurricane Igor	20-Sep	5 days
2011	Wind Storm	8-Dec	2 days
2012	Tropical Storm Leslie	11-Sep	5 days

b) See the response to Request for Information PUB-NP-070.

c) Newfoundland Power is not aware of having applied to the Board to defer significant storm-related operating costs in the past. See the response to Request for Information PUB-NP-070 for details on how the Company manages costs related to restoring service to customers following severe weather conditions.

Outside of an extraordinary event, Newfoundland Power would not anticipate applying for a deferral for future recovery of operating costs as a result of severe weather conditions. As such, exposure to storm-related costs continues to be a risk for the Company.

Newfoundland Power – 2025/2026 General Rate Application

For example, in Order No. UE22-8, the Island Regulatory and Appeals Commission approved, on an interim basis, an application by Maritime Electric to defer costs associated with Hurricane Fiona of approximately \$35.9 million.