

1 **SECTION 1: INTRODUCTION**2  
3 **Q. Reference: NLH-NP-006**

4 **What percentage of the reduction in real operating cost per customer is attributable**  
5 **to customer growth? Assuming the same number of customers in 2013 and 2022,**  
6 **please provide the growth rate percentage.**

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8 A. Newfoundland Power does not track operating costs related to customer growth, therefore  
9 it cannot provide what portion of its real operating cost per customer is related to  
10 customer growth.

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12 The operating cost per customer metric is a commonly used metric in the utility  
13 industry.<sup>1</sup> The operating cost per kWh metric has also been used by the Board to assess  
14 operating costs over time.<sup>2</sup> In Newfoundland Power's view, not considering one part of a  
15 two-part metric disregards the intended use of that metric.<sup>3</sup>

16  
17 If the number of customers for 2022 were set at the 2013 number of customers, the  
18 requested calculation would show a reduction in real operating cost per customer of 3.2%  
19 over the 2013 to 2022 timeframe.<sup>4</sup>

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<sup>1</sup> See the response to Request for Information PUB-NP-011.

<sup>2</sup> See, as examples, the response to Request for Information PUB-NP-010 and page 35 of Order No. P.U 16 (2019).

<sup>3</sup> The purpose of the operating cost per customer metric is to consider a utility's operating costs in relation to the customer base it serves in that year. The metric, as well as the operating cost per kWh, provides for a comparison of operating costs on a "per unit" basis over time. As such, using a customer base from 2013 in the 2022 operating cost per customer calculation disregards the purpose of the metric.

<sup>4</sup>  $\$276 - \$285 / \$285 = (3.2\%)$ .