Section 2: Customer Operations/Operating Costs

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Q. Volume 1, Section 2, page 2-31, Table 2-5 and Additional Information, PUB Information Request (ii), Schedule B, Attachment 1, page 2 of 4. Administration and Engineering Support comprise close to 30% of total Operating Costs – Electricity Supply. Please provide details on what percentage of these costs are used by each Function and explain how specific costs are allocated between the Function and Engineering Support. For any third party vendors contracted to provide Administration and Engineering Support, please provide details on these arrangements.

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A. Gross operating costs for Administration and Engineering Support include costs associated with electricity system operations and engineering which cannot be allocated to a specific function (e.g. distribution or transmission) or to a specific capital project.¹

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Under the Company's General Expenses Capitalized ("GEC") methodology, a portion of these costs are reallocated to capital through indirect GEC transfers as approved by the Board in the Company's 2022/2023 General Rate Application.² For example, in 2023 approximately \$2.4 million of Administration and Engineering Support costs were allocated to capital through indirect GEC. This reduces the net operating costs for Administration and Engineering Support for 2023 to \$7.0 million, or approximately 24% of the total Electricity Supply Function.³

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Net operating costs for Administration and Engineering Support primarily include the operation of the Company's system control center, the remaining engineering, operations and administration costs, and central dispatch.

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Table 1 provides a breakdown of these net operating cost components as a percentage of the total Electricity Supply Function.

Table 1: Administration and Engineering Support Breakdown by Components

Description	(%)
Engineering, Operations and Administration Labour	12%
System Control Center	8%
Other Non-Labour ⁴	4%
Total	24%

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The costs referenced are gross operating costs. See the 2025/2026 General Rate Application, Volume 1, Application, Company Evidence and Exhibits, Exhibit 1. For a reconciliation of gross operating costs to net operating expenses, see the response to Request for Information NLH-NP-039.

See Order No. P.U. 3 (2022) and the 2022/2023 General Rate Application, Volume 2, Supporting Materials, Tab 6, Review of General Expenses Capitalized, Attachment B: Review of GEC Ratios, page 5.

^{(\$9.4} million – \$2.4 million = \$7.0 million / (\$31.7 million - \$2.4 million) = 24%). A similar portion of costs would be forecast to be allocated to indirect GEC annually through 2026.

Includes operating costs for travel, operating materials and education and training costs that are coded directly to the Administration and Engineering Support function.

Newfoundland Power does not regularly use third-party vendors to provide general Administration and Engineering Support.