

1 **Q. Further to the response to NLH-NP-027, Attachment A, please explain why 2023**  
2 **actual labour costs for distribution maintenance were higher than 2023TY.**  
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4 A. Newfoundland Power's 2023 actual labour for Distribution was \$7,559,000, an increase  
5 of \$317,000 or 4.4% as compared to the test year. The increase is primarily due to  
6 operating labour associated with distribution line inspections and vegetation  
7 management, as well as for training and education.<sup>1</sup> The increase was partially offset by  
8 lower distribution overtime labour costs.

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<sup>1</sup> Distribution labour associated with employee training and education reflects the return to normal training following COVID-19 restrictions. It includes training such as risk management and job safety planning code and traffic control requirements.