

1 Q. On page 17, lines 6 to 9 of Mr. Osmond's Prefiled Testimony, it is proposed
2 that the Wabush surplus be refunded to Wabush customers in 2002 on the
3 basis of each customer's proportionate share of the 2001 revenues. The
4 surplus has been accumulating since 1989. Is this refund fair to the
5 customers who have left the system since 1989?
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7 A. To be theoretically precise the refund should be made to all customers who
8 have been billed on the Wabush system since 1989 however this is no longer
9 possible. Some customers have since left the area and would not be able to
10 be tracked as well there have been numerous customer transfers and name
11 and address changes since this time. Further, it would be a significant
12 administrative exercise to attempt to calculate the refund over that time frame
13 as several years of records are not available in electronic form.