1 Q. Would Hydro generally agree that its cost of issuing debt during the first ten 2 trading days of October is an unbiased estimate of the average cost of its 3 issuing debt during all the business days of the subsequent Test Year? If not, 4 please explain why Hydro's cost of issuing debt during the first ten trading 5 days of October is either systematically higher or lower than that which can 6 be expected to prevail at other times during the subsequent year. 7 8 9 A. As noted in Section II of Exhibit MGB-1, in the preparation of its submission, 10 Hydro referred to Order Nos. P.U. 16 (1998-99) and P.U. 36 (1998-99) as 11 they pertained to the establishment of an automatic adjustment mechanism 12 for Newfoundland Power. That mechanism contemplates an annual review of

the Rate of Return on Rate Base, predicated partially on a review of

manner that is similar to that proposed by Hydro.

underlying long term borrowing rates. These rates are determined in a

1516

17

18

19

20

21

22

13

14

The "first ten days of October" is a point in time estimate and might not be representative of borrowing rates for the coming year. Hydro normally relies on the advice of its financial advisors when acquiring estimates of future movements in interest rates, but it is recognized that these estimates are based on expected market conditions that may or may not transpire. Either method of estimation could be viewed as unbiased.