1 Q. Does NERA consider embedded cost studies controversial in terms of methodology and rate implementation? (Cost of Service Evidence, page 17, 2 3 lines 1 to 3) 4 5 6 A. NERA has provided the following response to this Request For Information: 7 8 Referenced text: 1 Marginal cost studies have generally been controversial in terms of methodology 2 and rate implementation and it may therefore not be prudent to dramatically alter 3 NP's rate structure based on the results of this single marginal cost study. It is 9 We do consider the choice of embedded cost approaches and implications of 10 embedded cost results for rate implementation to be controversial.