Q. <u>DISTRIBUTION</u>

PUB 43.0

B-25 Extensions

Per Table 2, the unit costs data for 2005F is based on total new customers of 3,771. However, the number of new customers for 2005 is given as 3,161 in Note 4 of the 2005 Capital Expenditure Status report (Appendix A p.3 of 5).

Please explain the difference.

A. General

In accordance with the Provisional Capital Budget Application Guidelines issued by the Board on June 2, 2005 (the "Provisional Guidelines"), Newfoundland Power has attempted, where possible, to modify its capital budgeting process to accommodate the goals of improved transparency and consistency in budgeting. For the Distribution budget category, the Company has adopted a framework whereby budget estimates are derived using one of three methods.

For projects where the nature and scope of the work could be determined at the time the budget is prepared, budget estimates were based on detailed engineering assessments. Such projects are typically directed at identified needs, and the work is capable of advance planning and scheduling. The Distribution projects that were estimated in this manner are the Distribution Reliability Initiative, Rebuild Distribution Lines and Feeder Additions/Upgrades to Accommodate Growth.

 For projects where it is not possible to determine the nature and scope of the work at the time the budget is prepared, budget estimates are based either on unit cost information derived from historical average expenditures, or on the basis of average historical costs adjusted for inflation.

Average historical unit costs provide a measure of transparency to the budgeting process. However, for unit costs to be an effective budgeting tool, two things are required: (1) a base with predictive value from which a unit cost can be derived; and (2) a means of forecasting changes to that base. Where information on which to base unit costs cannot be determined or where unit costs are of limited predictive value, budget estimates are based on average historical costs adjusted for inflation

The budget estimates for Extensions, Meters, *new* Services, and *new* Street Lights are based on average historical unit costs.

 For *replacement* Services, as noted in the response to PUB 46.0 NP, the actual number of replacements is not tracked, and it is therefore not possible to derive the unit costs. For *replacement* Street Lights, as noted in the response to PUB 48.0 NP, the unit cost per replacement has no predictive value with respect to future replacement requirements. The budget estimates for these items are based on the arithmetic average of historical

expenditures over the most recent 5-year period, adjusted for inflation. The budget estimates for the Transformers and Reconstruction projects are derived using the same method.

Unit Costs and Customer Growth

Prior to this year's capital budget process, Newfoundland Power based its expenditure projections for Extensions (and for *new* Services) on the expected number of gross new Domestic customer connections. Because of difficulties associated with the way General Service customer connections had been tracked historically, reliable data for new connections of General Service customers was not available. Gross new Domestic customer connection data was readily available, and provided a reasonable proxy for establishing unit costs.

In an effort to provide an improved basis for estimating budget requirements using unit costs, the Company implemented changes this year in its tracking of General Service customer connections. Those changes make it possible to track connections of General Service customers in *new* serviced premises separately from connections of General Service customers in *existing* premises. As a result, the Company was able to obtain a more accurate count of new connections for General Service customers. Further, by taking advantage of changes in the Customer Service System that had been implemented several years ago, it was also possible to obtain historical information on new General Service customer connections. With this better information, including restated historical unit cost information, the Company was able to base its unit cost calculations for the Extensions project, and for the *new* services component of the Services project on *total* new customer connections (Domestic and General Service).

The Difference Explained

The difference between the forecast number of 3,771 customers upon which the unit cost for 2005F shown in Table 2, page 26, Schedule B is based and the forecast number of 3,161 customers referenced in the 2005 Capital Expenditure Status Report reflects the change in the method for deriving unit costs for the Extensions project as described above.

For consistency with the 2005 Capital Budget Application as filed, the explanation provided in the 2005 Capital Expenditure Status Report is based on the number of gross new Domestic customer connections (3,161), which is the basis on which the 2005 budget estimate was derived

The 3,771 new customer connections on which the forecast 2005 unit costs shown in Table 2, page 26, Schedule B are based include both Domestic and General Service customer connections.