

1 **Q. Please provide precedents that Newfoundland Power is aware of for a regulated**
2 **utility deferring a general rate application while at the same time having its revenue**
3 **requirement being approved for recovery in rates from customers (either through a**
4 **rate increase or the deferral of the calculated revenue shortfall based on a revenue**
5 **requirement that is untested).**

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7 A. The response to Request for Information PUB-NP-001 provides detailed information on 5
8 past applications by Newfoundland Power where the Board approved deferred cost
9 recovery (the “prior applications”).

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11 In each of the prior applications, the practical effect of the Board’s approval of deferred
12 cost recovery was to defer Newfoundland Power’s next general rate application (“GRA”)
13 to the succeeding year. This is because the Board’s denial of any prior application would
14 practically have required Newfoundland Power to file a GRA that year to ensure it had
15 reasonable opportunity to earn a just and reasonable return in that year as it is permitted
16 under Section 80 of the *Public Utilities Act*.