

1 **Q. Schedule 1, Page 9 of the application states:**
2

3 *"The analysis indicates that current customer rates will not provide Newfoundland*
4 *Power the opportunity to earn a just and reasonable return on its forecast rate base*
5 *within the meaning of Section 80 of the Public Utilities Act."*
6

7 **Please provide all sections of *Public Utilities Act* referred to in this statement and**
8 **provide all support for this statement including forecast returns and comparable**
9 **credit metrics forecast for 2016 of Newfoundland Power and other electric utilities**
10 **in Canada.**
11

12 A. The statement quoted refers to Section 80 of the *Public Utilities Act*. Newfoundland
13 Power is unable to discern to what else, or more, "...all sections of the *Public Utilities*
14 *Act* referred to in this statement..." refers.
15

16 Newfoundland Power has not had an expert complete a comparative review of the
17 Company's capital structure and is therefore not in a position to provide the data
18 requested. A comprehensive expert report in relation to Newfoundland Power's capital
19 structure will be filed with the Company's next general rate application.