



February 26, 2016

Ms. G. Cheryl Blundon  
Board of Commissioners of Public Utilities  
120 Torbay Road, P.O. Box 12040  
St. John's, NL A1A 5B2

Dear Ms. Blundon:

**Re: Newfoundland Power 2016-2017 General Rate Application**

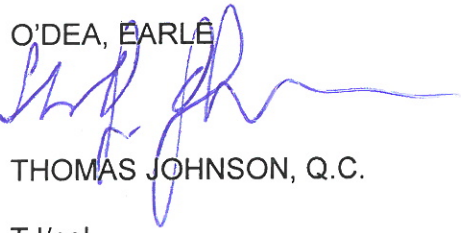
In relation to the above noted application please find enclosed one (1) original and twelve (12) copies of each of the Consumer Advocate's Witness List and Issues List.

A copy of this correspondence, together with the enclosures, has been forwarded directly to the parties listed below.

We trust the foregoing is found to be in order.

Yours very truly,

O'DEA, EARLE



THOMAS JOHNSON, Q.C.

TJ/cel  
Encl.

cc: Newfoundland & Labrador Hydro  
Attention: Geoffrey P. Young, Senior Legal Counsel

Newfoundland Power  
Attention: Peter Alteen, Q.C.

Curtis, Dawe  
Attention: Ian F. Kelly, Q.C.

**IN THE MATTER OF**

the *Public Utilities Act*, R.S.N.L. 1990,  
Chapter P-47 (the "*Act*"), as amended;

**AND**

**IN THE MATTER OF**

A General Rate Application (the "Application")  
by Newfoundland Power Inc. ("Newfoundland Power")  
to establish customer electricity rates for 2016 and 2017.

**CONSUMER ADVOCATE'S WITNESS LIST**

The witnesses who are currently expected to appear in this proceeding on behalf of the Consumer Advocate are as follows:

- |                       |                                       |
|-----------------------|---------------------------------------|
| 1. Dr. Laurence Booth | Cost of Capital and Capital Structure |
| 2. Dr. Sean Cleary    | Capital Structure                     |

The Consumer Advocate reserves the right to call further witnesses as it considers appropriate to respond to issues or matters arising from the evidence of, and issues raised by, other Intervenors and the Board's staff.

Dated at St. John's in the Province of Newfoundland and Labrador, this 26<sup>th</sup> day of February, 2015.



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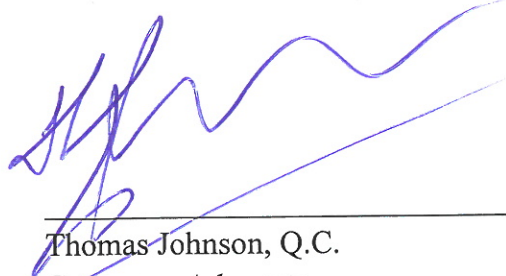
**CONSUMER ADVOCATE'S ISSUES LIST**

In the Consumer Advocate's submission, the issues arising in the proceeding are as follows:

1. Operating Costs for Test Year 2016 and 2017.
2. Forecast Revenue Requests for customer rates for 2016 of \$669,685,000.00 and for 2017 of \$682,578,000.00.
3. What is a fair return on equity for Newfoundland Power Inc. in 2016 and 2017?
4. What is an appropriate capital structure for Newfoundland Power Inc. in 2016 and 2017?
5. The appropriateness of Newfoundland Power's proposal to authorize the recovery over a three year period of a forecast 2016 revenue shortfall of an estimated \$4,095,000.00.
6. The appropriateness of Newfoundland Power Inc.'s proposal that the Board approve the company's evaluation of customer conservation programs by the use of the total resource cost test and program administrator cost test as described in the evidence.
7. Conservation and Demand Management initiatives and programming.

8. Such other issues as may arise.

Dated at St. John's in the Province of Newfoundland and Labrador, this 26<sup>th</sup> day of February, 2015.



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To: Newfoundland Power Inc.  
Attention: Ian F. Kelly, Q.C./Peter Alteen, Q.C.

Newfoundland and Labrador Hydro  
Attention: Mr. Geoffrey Young, Senior Legal Counsel