

1 Q. Reference: CA-NP-09

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3 NP was asked whether its actual borrowing cost met the fair return standard and
4 did not answer. Please answer yes or no.

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6 A. Newfoundland Power is not obliged to respond to Requests for Information in a manner
7 dictated by the Consumer Advocate.

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9 The issue of *all* of Newfoundland Power's First Mortgage Bonds, which account for the
10 bulk of the Company's actual borrowing cost, was approved by the Board in advance as
11 required by Section 91 of the *Public Utilities Act*. Given this, in Newfoundland Power's
12 view, there is no issue that arises in this proceeding related to recovery of the borrowing
13 costs associated with these Bonds or whether those costs meet the fair return standard.