Reference: Dr. Cleary Evidence, Page 17, Lines 28-29: If Dr. Cleary's 1 0. 2 analysis leads him to conclude that there have been no material changes in the business risk of Newfoundland Power since 2013, or 2003, please explain the basis 3 for Dr. Cleary recommended reduction in the common equity ratio from 45.0 4 percent to 40.0 percent. Does Dr. Cleary believe that the Board erred in its 2013 5 Order when it determined that it was appropriate to maintain Newfoundland 6 7 Power's common equity ratio at 45.0 percent? If so, please elaborate on the reasons why Dr. Cleary disagrees with the Board's decision in 2013? 8 9 Dr. Cleary was not involved in the 2013 hearing and certainly has no reason to 10 Α. 11 believe the Commission erred in its 2013 decision after consideration of all the evidence 12 provided at that time. 13

He has been asked to determine an appropriate common equity ratio for NP in the 2016 proceedings, based on the evidence that is currently available. This is the basis for his analysis and recommendations.