

1 **Q. Please provide all work papers and supporting documents used by Dr.**  
2 **Cleary in the development of Figure 4, Figure 5, Figure 6, Figure 7, Table 8, Table**  
3 **11, Table 12, Table 13, Table 14, and Table 15. Please provide all electronic work**  
4 **papers in working Excel format with all formulas intact.**

5  
6 **A. All of the data and calculations are provided in the appropriate Appendixes, as**  
7 **noted below:**

- 8 1. Figure 4: “Appendix A – Figure 4 data”
- 9 2. Figure 5: “Appendix B – Figure 5 data”
- 10 3. Table 13: “Appendix C – Table 13 data and calculations”
- 11 4. Table 14: “Appendix D – Table 14 data and calculations”
- 12 5. Table 15: “Appendix E – Table 15 data and calculations”
- 13 6. Figure 6: “Appendix F – Figure 6 data”
- 14 7. Figure 7 and Table 8:
  - 15 (a) “Appendix G – data and calculations for NP for Figure 7 and Table 8”
  - 16 (b) “Appendix H – Canadian proxies data and calculations for Figure 7 and Table
  - 17 8”
  - 18 (c) “Appendix I – US data and calculations for Figure 7 and Table 8”
  - 19 (d) “Appendix J – Summary-combined data and calculations for Figure 7 and
  - 20 Table 8”
  - 21 (e) “Appendix K – US Utilities data for Figure 7 and Table 8 from Compustat”
  - 22 (f) The data for NP, NSPI, Enbridge Gas and Gaz Metro was obtained from
  - 23 annual reports that were obtained for every year from 1996 to 2014 for
  - 24 Newfoundland Power, Enbridge Gas Distribution Inc., Emera (for NSPI), and
  - 25 from 2009-2015 for Valener (for Gaz Metro). These reports are available at
  - 26 Sedar.com.
- 27 8. Table 11: The DBRS ratings reports that were used to construct this table:

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16

(a) "Appendix L- part 1 -- CU Inc -- DBRS"

(b) "Appendix L- part 2 -- Enbridge Gas DBRS"

(c) "Appendix L- part 3 -- Fortis Alberta DBRS"

(d) "Appendix L- part 4 -- Fortis BC DBRS"

(e) "Appendix L- part 5 -- Gaz Metro DBRS"

(f) "Appendix L- part 6 -- NSPI -- DBRS"

(g) The DBRS rating report used for NP was provided in Exhibit 4 of NP's evidence.

9. Table 12: The metric criteria were obtained from reports provided in NP's RFI responses as noted below:

(a) Moody's criteria as provided on page 24 of the "Moody's Methodology Report 2013," provided in NP's response to CA-NP-028, Attachment A.

(b) DBRS criteria as provided on page 8 of the "October 2015 DBRS Methodology Report," provided in NP's response to CA-NP-029, Attachment A.