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Q. Further to IC-CA-1 above, please confirm that the proposed GRA rate increase for Newfoundland Power, excluding the impact of the RSP Change, Rate Mitigation Conclusion and Recovery of Supply Cost, is about 19.5%.

A. As stated in the response to IC-CA-1, Mr. Doug Bowman defers to Hydro to defend and explain its estimated rate increases, but does not take issue with its calculation. However, he notes that the proposed rates are based on a fictitious future, and as a result, cost allocations to customer classes cannot be considered fair since they are not based on the costs customers are expected to impose on a system with off-island purchases displacing much of Holyrood energy production. Mr. Doug Bowman notes that Hydro's cover letter accompanying the 2017 General Rate Application indicates that a primary purpose of the application is to manage cost increases for customers (page 2 of cover letter). With this purpose in mind, Hydro has proposed a rate mitigation plan that is expected to result in a 50.9% rate increase for Newfoundland Power over an 18-month period. This is very high, and makes one wonder if an additional rate mitigation plan is needed to manage rate impacts deriving from Hydro's proposed rate mitigation plan.