1	Q.	References:							
2		(i) NLH 2017 GRA, Evidence, chapter 1, pages 1.7 and 1.8							
3		(ii)	(ii) NLH 2017 GRA, Evidence, chapter 5, schedule VII, page 5-VII-3						
4		(iii)	(iii) NLH 2017 GRA, Evidence, chapter 5, pages 5.35 and 5.36						
5		(i)	« Hydro is also seeking approval of the following: []						
6			• a revised transmission demand rate for Labrador Industrial Customers to						
7			promote the efficient use of customers' demand requirements (see Chapter						
8			5). »						
9		(ii)							
			Proposed Rates Reflecting Proposed Methodology (per kW per month)						
				Proposed January 1, 2018 Interim Rate	Proposed January 1, 2019 Rates				
10		First Block (90% of Power on Order) \$1.34 Metered Demand in Excess of First Block \$2.83							
11		(i)	(i) « Hydro is proposing to continue to use the same methodology to						
12			determine the costs to be recovered from the Labrador Industrial						
13			Transmission Customers. The average embedded cost for transmission						
14		demand allocated to Labrador industrial Customers has increased from the							
15		\$1.19 per kW approved for the 2015 Test Year to \$1.44 per kW for the							
16			2018 Test Year and \$1.86 per kW	for the 2019 Test Yea	<u>ır.</u> »				
17		(ii)	« The proposed modification to th	ne rate design does no	ot change the total				
18			Test Year cost to be recovered fro	m Labrador Industria	l Transmission				
19			Customers. However, the propose	d rate design provide	s a stronger				
20		financial incentive for the Labrador Industrial Customers to reduce their							
21		winter peak demands. Reduced peak demand from this customer class can							
22		contribute to reduced costs for all customers on the Labrador							
23			Interconnected System. »						

Justify the apparent absence of revenue neutrality of the proposed inclining block
rate structure for the Labrador Industrial Transmission demand charge?

Average rate	1,44	100%	1,86	100%
First tier	1,34	90%	1,86	90%
Second tier	2,83	10%	3,95	10%
Average rate	1.49	100%	2.07	100%

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A. Hydro's 2018 Test Year revenue requirement from the Labrador Industrial class transmission demand is \$4,247,151. Hydro's interim rates seek to collect approximately 70% of the increase relative to existing rates. As such, Hydro's rate design target for 2018 interim rates is approximately \$4,032,000.

9

Table 1 provides the collection of Hydro's 2018 interim revenues under both the proposed Labrador Industrial rate design and the existing rate structure.

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<sup>&</sup>lt;sup>1</sup> Exhibit 14, Page 101 of 107, Column 5, Line 66.

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**Table 1 Comparison of Rate Designs** 

	Proposed Rate Design			Existing Rate Design		
	Power on	Proposed		Billing	Proposed	
Customer	Order	Rates	Revenue	Demand	Rates	Revenue
IOCC						
First Block	2,646,000	1.34	3,545,640	2,940,000	1.37	4,027,800
Excess Block	170,000	2.83	481,100			-
	2,816,000		\$ 4,026,740			\$ 4,027,800
Wabush						
First Block	3,240	1.34	4,342	3,600	1.37	4,932
Excess Block	360	2.83	1,019			
	3,600		\$ 5,360			\$ 4,932
Class Total						
First Block	2,649,240		3,549,982	2,943,600		4,032,732
Excess Block	170,360		482,119			
	2,819,600		\$ 4,032,100			\$ 4,032,732

1 As shown in Table 1, both rate design options collect the same amount of revenue

from the Labrador Industrial class and are therefore revenue neutral. Hydro has

taken this same approach for 2019 proposed rates which seek to collect Hydro's

4 2019 Cost of Service plus any revenue deficiency from 2018.

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 $^{\rm 2}$  Variances of \$100 and \$732 exist due to rounding of approved transmission rates to two decimal places.