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1	Q.	Volume III (3 rd Revision), Exhibit 14: 2018 Test Year Cost of Service Study
2		
3		Please provide detailed calculations for each line item in Column 5, Transmission
4		Demand, and Column 18, Specifically Assigned Customer. (Volume III (3rd
5		Revision), Exhibit 14: 2018 Test Year Cost of Service Study, Schedule 2.4A, Page 1 of
6		2)
7		
8	Α.	Schedule 2.4A provides the functional classification of operating and maintenance
9		(O&M) expense on the Island Interconnected System for the 2018 Test Year.
10		
11		Column 5 on this schedule provides the Operating and Maintenance (O&M)
12		expense functionalized as transmission common and column 18 on this schedule
13		provides the O&M expense functionalized as specifically assigned transmission. The
14		O&M costs determined to be Specifically Assigned through the cost of service
15		methodology are a component ¹ in the determination of the total Specifically
16		Assigned charges which apply to Island Industrial Customers for which the
17		specifically assigned assets provide service. ²
18		
19		In order to derive the amount of direct O&M to be sub-functionalized between
20		transmission common ³ and Specifically Assigned transmission assets, the total O&M
21		costs determined for transmission and terminal station from Hydro's business units
22		is allocated across all functions served by these business units. These include

¹ There are three components that can comprise specifically assigned charges: O&M, depreciation and return. When the customer has fully funded the asset through a contribution, the O&M is the only component of the specifically assigned charge.

² As there is no specifically assigned charge for Newfoundland Power, Newfoundland Power's specifically assigned costs are recovered through their energy charges. ³ Transmission common is referred to as Transmission demand in Schedule 2.4A.

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1	production demand and energy, ⁴ rural production and transmission, rural
2	distribution, and accounting. The allocation of direct transmission O&M to these
3	functions is based on the original cost method, which uses the portion of the total
4	original cost of assets within the function to the total original cost of the larger
5	asset group.
6	
7	A comparable approach is followed in functionalizing Administrative and General
8	operating expenses from each business unit grouping across function based on
9	original costs. The use of functionalization based original asset costs has been
10	approved by the Board and is consistent with the way Hydro has functionalized
11	O&M for the Island Interconnected System in the past.
12	
13	Once this exercise is complete, the portion of the total transmission (see Table 1,
14	Column 8) O&M which needs to be sub-functionalized between transmission
15	common and specifically assigned has been isolated, as shown in Table 1.

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⁴ Some transmission assets in service are functionalized as generation as they primarily serve the purpose of interconnecting hydraulic generation assets to the bulk grid.

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1	2	3	4	5	6	7	8
	Total O&M	Production	Production	Rural	Rural	Accounting	Transmission
		Demand	Energy	Transmission	Distribution		O&M
Direct O&M Expense							
Transmission Lines	3,334,387	134,894	160,904	519,250	-	-	2,519,338
Terminal Stations	4,482,082	438,946	411,630	326,032	195,152	-	3,110,322
Other	2,253,167	135,481	142,341	286,877	33,579	-	1,654,888
Total Directly Assigned O&M	10,069,635	709,321	714,875	1,132,159	228,731	-	7,284,548
Administrative & General							
Plant-Related							
Production	6,461,496	3,739,501	2,721,994	-	-	-	-
Production, GT & Diesel	1,122,329	1,122,329	-	-	-	-	-
Transmission	3,530,337	212,276	223,025	449,488	52,613	-	2,592,935
Distribution	1,671,105	-	-	-	1,671,105	-	-
Production, Transmission,	153,722	53,835	39,102	6,908	13,554	355	39,968
Distribution and General Plant							
Production, Transmission,	1,144,832	209,138	50,978	102,742	189,295	-	592,680
Distribution, excluding							
Hydraulic and Holyrood							
Property Insurance	1,956,692	947,388	676,435	27,709	47,699	6,412	251,051
All Expense-Related	26,380,008	12,507,697	6,127,299	491,439	3,135,409	956,141	3,162,023
Production, Transmission and	1,512,232	743,968	364,457	29,231	186,497	-	188,080
Distribution Expense-Related							
Total Administrative & General	43,932,753 ⁵	19,536,133	10,203,290	1,107,517	5,296,171	962,907	6,826,736

Table 1 Determination of Transmission Operating and Maintenance Expense to be Sub-Functionalized between Transmission Common and Specifically Assigned (2018TY)

1	The next step is the sub-functionalization of the transmission O&M into two
2	separate categories; transmission common and specifically assigned. To determine
3	the allocation of the transmission O&M between transmission common assets and
4	specifically assigned assets, Hydro proposed to use asset values stated in 2018
5	dollars based on the Handy Whitman index.

⁵ The total differs from the Cost of Service, Schedule 2.4A as Municipal Tax and PUB Assessment costs are not allocated within this schedule and therefore have been excluded in the illustration.

Total per Table 1	\$43,932,753			
Municipal Tax	\$1,286,578			
PUB Assessment	\$1,041,343			
Total per Schedule 2.4A	\$46,260,674			

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1	The steps involved in indexing the existing original cost asset values to 2018 dollars					
2	were as follows:					
3	1. Hydro summarized historical asset costs for all individual asset records by					
4	system, function, class, customer, and in-service date as at December 31, 2018,					
5	and calculated the average of the 2017 and 2018 closing balances, consistent					
6	with the 2018 Cost of Service Study methodology. ⁶					
7	2. Hydro categorized asset values by in-service date and class in order to apply					
8	Handy-Whitman or GDP indexes.					
9						
10	Table 2 shows the resulting asset average balances once Handy-Whitman indexes					
11	were applied. It also shows the indexed balances of the specifically assigned assets					
12	as a numerical value and as a percentage of the total asset balances.					

	Total Indexed Asset Values (\$ millions)	Specifically Assigned (\$ millions)	Specifically Assigned (%)
Transmission Lines	1,388.0	93.5	6.7%
Terminal Stations	813.4	82.5	10.1%
Total Transmission and Terminals	2,201.4	176.0	8.0%

Table 2 Derivation of Specifically Assigned Allocation (2018TY)

13The percentages derived in Table 2 represent the portion of the total transmission14line and terminal station assets which are related to specifically assigned assets15based on the analysis performed on indexed values. Hydro applied these16percentages to the transmission O&M values from column 8 in Table 1 to17determine the sub-functionalization of transmission O&M between transmission18common and specifically assigned assets.

⁶ For the 2018 Test Year, Hydro's data includes actual values from 1956 to 2016, and forecast values for 2017 to 2018.

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1	To determine the sub-functionalization of Other ⁷ transmission expenses and
2	Administrative and General expenses between transmission common and
3	specifically assigned, Hydro applied the overall indexed cost percentage of
4	transmission and terminals (8.0% specifically assigned).
5	
6	Table 3 provides summary of the sub-functionalization of transmission O&M
7	between specifically assigned and transmission common.

	Total Transmission O&M	Specifically Assigned		Transmission Common	
	\$	%	\$	%	\$
Direct O&M Expense					
Transmission Lines	2,519,338	6.7	169,631	93.3	2,349,707
Transmission Stations	3,110,322	10.1	315,552	89.9	2,794,770
Other	1,654,888	8.0	132,291	92.0	1,522,598
Total Directly Assigned O&M	7,284,548		617,474		6,667,075
Total Administrative & General	6,826,735	8.0	545,724	92.0	6,281,011

Table 3 Sub-Functionalization of Transmission O&M BetweenSpecifically Assigned and Transmission Common (2018TY)

⁷ The "Other" category includes a portion of operating expenses related to various business units, including System Operations, Environmental Services, Properties, Civil Engineering, Electrical Engineering, Mechanical Engineering, T&D Engineering, and P&C Engineering.