

- 1 **Q. Reference: “2022/2023 General Rate Application,” Newfoundland Power, May 27,**  
2 **2021, Volume 1, Exhibits 1 and 2.**  
3  
4 **Please provide:**  
5  
6 **a) The number of full-time equivalents (“FTE”) by year for each functional area in**  
7 **Exhibit 1; and**  
8  
9 **b) The change in FTEs for each year over the previous year and quantify the**  
10 **impacts of the FTE change as a proportion of the total change in costs for each**  
11 **of lines 1, 2, and 3 in Exhibit 2.**  
12  
13 a) Newfoundland Power does not track full-time equivalents (“FTE”) by the functional  
14 areas shown in Exhibit 1. Therefore, the requested information cannot be provided.<sup>1</sup>  
15  
16 b) See part (a).

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<sup>1</sup> See the *2022/2023 General Rate Application, Volume 2, Supporting Materials, Tab 1, Labour Forecast 2021-2023*, for a review of the Company’s overall labour forecast.