

IN THE MATTER OF the *Public Utilities Act*,
R.S.N.L. 1990, Chapter P-47, as amended (the
“Act”); and

IN THE MATTER OF a General Rate
Application by Newfoundland Power Inc. to
establish customer rates for 2010

To: Board of Commissioners of Public Utilities

**Suite E210, Prince Charles Building
120 Torbay Road
P.O. Box 12040
St. John’s, NL A1A 5B2
Attention: Ms. G. Cheryl Blundon,
Director of Corporate Services and Board Secretary**

1 CA-NP-336 Further to CA-NP-305(a), NP has stated that as Newfoundland Power’s non
2 pension retirement benefit plan is an unfunded plan annual financial
3 statements are not prepared. Does NP receive reports or statements from its
4 insurer in relation to the non pension retirement benefit plan on a periodic
5 or other basis? If so, please provide all such reports or statements provided
6 from 2005 to present.

7 CA-NP-337 Further to CA-NP-326, please provide the information requested so that the
8 impact of all retirees paying one-half of premiums on the calculations
9 respecting OPEBs as set out in the Application may be ascertained.

10 CA-NP-338 Further to CA-NP-325, part (c), NP refers to an individual cap of \$5,000.00.

1 (a) What impact does the \$5,000.00 annual cap for these individuals have
2 on the employer premium rates?

3 (b) Please show the rates “with the cap” and “without the cap”.

4 (c) For each of the past 3 years, what was the average benefit (i.e. benefits
5 that would be subject to the cap) paid out to (or made on behalf of) a
6 retiree who is age 65 or older?

7 (d) For the past 3 years, please show the number (and percentage) of
8 retirees age 65 or older whose annual benefits payout was?

- 9 (i) less than the average payout;
10 (ii) more than the average payout;
11 (iii) less than the \$5,000.00 cap;
12 (iv) maxed at the \$5,000.00 cap.

13 (e) For each of the past three years, what was the average benefit paid out
14 to a retiree who was under age 65?

15 (f) For the past 3 years, please show the number (and percentage) of
16 retirees who are less than age 65 and whose annual benefit (i.e. those
17 type of benefits that are subject to a cap for those age 65 and older)
18 payout was:

- 19 (i) less than \$5,000.00;

- 1 (ii) more than \$5,000.00;
2 (iii) more than \$7,500.00;
3 (iv) more than \$10,000.00;
4 (v) more than \$12,500.00;
5 (vi) more than \$15,000.00;
6 (vii) more than \$17,500.00;
7 (viii) more than \$20,000.00.

8 CA-NP-339 Further to CA-NP-325, please provide a copy of the information which the
9 company obtained in 2005 as referred to in (d) (iv) to the reply of the
10 company.

11 CA-NP-340 In CA-NP-325, the company refers to Newfoundland and Labrador having
12 a means test for prescription drugs coverage for seniors over age 65. What
13 is the means test that is applied to determine eligibility for coverage under
14 this programme?

15 CA-NP-341 Further to CA-NP-325, is NP's consultants, Mercer, able to provide any
16 information regarding how common it is for employers to provide post-age
17 65 retirees benefits at no charge?

18 CA-NP-342 Further to CA-NP-325, is NP able to ascertain from its Fortis affiliates what
19 their respective post-age 65 premium funding policies are?

20 CA-NP-343 Regarding the \$5,000.00 annual limit, please confirm what benefits the cap
21 applies to and please confirm what benefits the cap does not apply to.

1 CA-NP-344 Regarding the \$5,000.00 annual cap, please confirm that the retiree and his
2 or her dependants each has a \$5,000.00 per person cap.

3 CA-NP-345 Further to CA-NP-325:

4 (a) Is there a written contract or agreement in existence by which the
5 company has required itself to pay 100% of premiums for retirees over
6 the age of 65 years? If so, please provide a copy of the same.

7 (b) If the company has not entered into a written contract or agreement
8 requiring itself to pay 100% of premiums for retirees over the age of
9 65 years, state the basis of the requirement, if any, upon the company
10 to pay 100% of these premiums?

11 (c) What consideration was paid to or given to the company in return for
12 the company's agreement to pay 100% of the premiums for those
13 retirees over the age 65?

14 (d) Does NP consider itself to be under a perpetual obligation to pay
15 100% of the premiums for retirees over the age of 65? Please fully
16 explain the basis for that answer, whether the answer is "yes" or "no".

17 (e) If NP does not consider itself to be under a perpetual obligation to pay
18 100% of premiums for retirees over the age of 65, what action would
19 be necessary to cease the obligation?

1 CA-NP-346 With regard to the Grant Thornton report entitled "Board of Commissioners
2 of Public Utilities Financial Consultants Report Newfoundland Power Inc.
3 2010 General Rate Application Hearing" dated July 31, 2009, it is stated on
4 page 36, lines 1-5 "In 2008 and 2007 the Company changed some of the
5 measures used in the STI program. In 2007, the STI measure 'Reliability –
6 Duration of Outages' (SAIDI) was replaced with '1st Call Resolution'. In
7 2008, the measure 'Reliability – Outages per customer' (SAIFI) was replaced
8 with the SAIDI measure. The 2009 measures remain the same as 2008.
9 According to the Company, 2010 targets will not be approved by the Board
10 of Directors until January 2010". What is the basis for making these changes
11 to the STI program? In particular, why was SAIDI dropped in 2007 and
12 added again in 2008?

13 CA-NP-347 With regard to the response to CA-NP-329, how do NP disconnections owing
14 to lack of payment compare to that in other Canadian Provinces?

15 CA-NP-348 With regard to the response to CA-NP-300:

- 16 (a) Please provide a summary of benchmark comparisons included in
17 evidence submitted with the Application. Identify which benchmarks
18 should be ignored by the Board and which benchmarks should not be
19 ignored by the Board and explain why they should not be ignored
20 given the "difficulties in drawing meaningful conclusions involving
21 the quality and availability of data supplied by others and observed
22 differences in the utilities supplying the data"?

1 (b) Please provide all documentation related to the preparation,
2 distribution and feedback associated with development of the most
3 recent Peer Group Report.

DATED at St. John's, in the Province of Newfoundland and Labrador, this 14th day of August, 2009.



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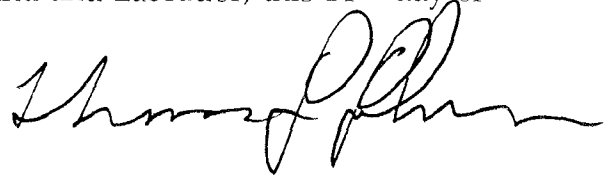
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