

August 26, 2009

Board of Commissioners  
of Public Utilities  
P.O. Box 21040  
120 Torbay Road  
St. John's, NL A1A 5B2

Attention: G. Cheryl Blundon  
Director of Corporate Services  
and Board Secretary

Ladies and Gentlemen:

**Re: 2010 NP General Rate Application**

Please find enclosed the original and nine copies of Newfoundland Power's Requests for Information numbered NP-CA-54 to NP-CA-59 with respect to the prefiled evidence of John Todd.

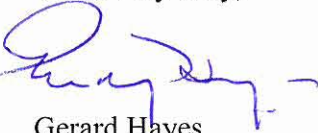
For convenience, the Requests for Information are provided on three-hole punched paper.

A copy of this letter, together with enclosures, has been forwarded directly to Geoffrey Young, of Newfoundland & Labrador Hydro and Thomas Johnson, Consumer Advocate.

Electronic copies of these Requests for Information will be forwarded in due course.

If you have any questions regarding the enclosed, please contact the undersigned at your convenience.

Yours very truly,



Gerard Hayes  
Senior Counsel

Enclosures

- c. Geoffrey Young (3 copies)  
Newfoundland and Labrador Hydro
  
- Thomas Johnson (2 copies)  
Consumer Advocate



Join us in the fight against cancer.

**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 (the “Application”) by Newfoundland Power Inc. (“Newfoundland Power”) to establish customer electricity rates for 2010.

---

**Requests for Information by  
Newfoundland Power Inc.**

**NP-CA-54 to NP-CA-59**

---

**Requests for Information**  
**Evidence of John Todd- 2010 General Rate Application**

NP-CA-54      Reference: Page 1, Lines 9-10

In Appendix A to Order No. P.U. 32 (2007), the Board outlines the regulatory framework applied by the Board in the regulation of Newfoundland Power (the "Regulatory Framework"). Please provide all references in the Regulatory Framework to the existence of a multi-year regulatory regime in this jurisdiction.

NP-CA-55      Reference: Page 6, Lines 29-32

Confirm that the 2008 Settlement Agreement provides that the matter of the accounting treatment of OPEBs is to be further considered by the Board at the next GRA.

NP-CA-56      Reference: Page 7, Lines 3-5

Explain the basis of Mr. Todd's suggestion that the "increases in operating costs and depreciation" account for 0.2% of the 6.1% proposed increase.

NP-CA-57      Reference: Page 7, Lines 25-30

Confirm that, if the Board defers all proposals in the Company's Application affecting rates until a GRA in 2010, the forecast return on equity for 2010 is 6.87% (see Volume 1 of Company Evidence, Exhibit 3, line 37).

NP-CA-58      Reference: Page 8, Lines 28-30

Under the proposed Pension Expense Variance Deferral Account ("PEVDA"), pension expense variances from the 2010 test year would be transferred to or from the RSA in 2010. If PEVDA does not become effective until 2011, as Mr. Todd suggests, explain how the PEVDA can be used to recover variances in 2010 pension costs.

NP-CA-59      Reference: Page 14, Lines 16-19

Does Mr. Todd agree that the recognition of OPEBs on an accrual basis improves intergenerational equity, which provides benefits to future customers and better reflects cost causality? If not, why not?