

1 **Q. Please confirm that in the absence of this General Rate Application, NP would have**
2 **filed an application with the Board (as it did on October 29, 2008 in respect of 2009**
3 **energy conservation costs) requesting approval of deferred recovery of its actual**
4 **2010 costs in respect of energy conservation.**

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6 A. In the *2009 Conservation Cost Deferral Application* (which was filed on October 29,
7 2008), Newfoundland Power sought approval to defer recovery of its 2009 costs
8 associated with the joint implementation with Newfoundland and Labrador Hydro of a
9 portfolio of customer energy conservation programs (the “Customer Program Portfolio”).

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11 The 2009 Customer Program Portfolio costs were not recognized in the establishment of
12 Newfoundland Power’s customer rates. The deferred recovery of the 2009 Customer
13 Program Portfolio costs was authorized by Order No. P.U. 13 (2009).

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15 Newfoundland Power filed the 2010 General Rate Application to ensure it had an
16 opportunity to earn a just and reasonable return in 2010 as provided in the *Public Utilities*
17 *Act*. Had Newfoundland Power had such an opportunity in 2010 with deferred recovery
18 of 2010 Customer Program Portfolio costs, then it would likely have requested such
19 deferred recovery.