

1 Q. **Reference: Evidence on Rate Stabilization Plan – Surplus Refund Plan**

2 Please indicate each and every administrative challenge associated with using
3 historical electricity consumption over the 2007 to 2013 period as the basis for
4 allocating a refund. (Surplus Refund Plan, Page 11, Lines 8-9)
5
6

7 A. As indicated on page 11, lines 10-13 of the Surplus Refund Plan:

8 “Customer turnover has been significant and it is difficult, if not impossible, to
9 identify and locate all customers and former customers entitled to a refund. The
10 administrative effort required to carry out appropriate due diligence to refund in
11 this manner would likely be time consuming and costly.”
12

13 The administrative difficulties that such a process entails, could include, but is not
14 limited to:

- 15 • Developing and implementing a reasonable list of methods to try to locate
16 customers that are no longer the same customer of record, including:
 - 17 ▪ Legal notices in Canadian and U.S. newspapers;
 - 18 ▪ Coordination with the postal service to find forwarding addresses;
 - 19 ▪ Checking death notices (should payment be made to the estate of?); and
 - 20 ▪ Utilizing the services of people search firms.
- 21 • Identification of customers that have moved within the Hydro/NP service
22 territory and are still customers under a different meter number;
- 23 • Identification of customer premises in which the name of the responsible party
24 has either been transferred or changed by reason of, for example, marriage; or
- 25 • Large volume and analysis of customer data.

26 Even if every administrative challenge was overcome, notwithstanding the cost and
27 effort, the end result would go beyond the way the RSP is normally collected and

- 1 refunded which targets existing and future customers of the customer class, not the
- 2 actual customers on a retrospective basis.