Q. Please explain why Hydro proposed a 2014 test year in its November 10, 2014
 amended general rate application while not proposing to change customer rates for
 that year.

A.

Hydro's original General Rate Application was filed in July 2013 based upon a 2013

Test Year forecast and proposed that new customer rates become effective January

1, 2014. Hydro also filed two applications for interim rate relief in 2014 recognizing
that delayed rate implementation could deprive Hydro of the opportunity to earn a
just and reasonable return on rate base for 2014. At the time of Hydro filing its

Amended Application, the Board had denied Hydro's requests for revenue relief in

2014. Newfoundland Power opposed approval of both interim rate applications.

At the time of filing the Amended Application in November 2014, 2007 Test Year base rates remained in effect and Hydro was forecasting a 2014 revenue deficiency of \$45.9 million. As a result, the Amended Application proposed the Board test costs for 2014 to determine 2014 revenue requirement to be recovered from customers.

The timing of filing of the Amended Application in November did not provide adequate time for the Board to implement new customer rates to provide recovery of 2014 revenue requirement. Hydro proposed the use of a portion of the RSP credit balance to provide recovery of the 2014 Revenue Deficiency. In Order No. P.U. 58(2014), the Board denied the proposed use of the RSP credit balance but approved the creation of a deferral account in relation to the \$45.9 million forecast

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<sup>&</sup>lt;sup>1</sup> See Order No. P.U. 40(2013) and Order No. P.U. 39(2014).

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- 1 revenue deficiency. Recovery of the deferral account balance is subject to a
- 2 subsequent determination by the Board.