Q. Further to the response to PUB-NLH-19 in relation to the 2013 RSP proceeding, in which Hydro states that "...ideally, the RSP methodology would have been able to handle these load variations, as variations of even greater magnitude have historically occurred in Hydraulic and Fuel Cost components of the RSP", provide the details on these variations of "greater magnitude" referred to in the response. Why, in Hydro's opinion, were such variations adequately dealt with by the RSP but the load variations were not?

A. The variations of greater magnitude refer to fuel cost variations as high as \$56.9 million in 2001 and hydraulic variations as high as \$54.3 million in 1987. This is shown in Appendix B of the Grant Thornton report on Historical Review of the RSP which was filed as Appendix C of Hydro's 2013 RSP filing on July 30, 2014 and has been included here as PUB-NLH-294 Attachment 1.

Since the inception of the RSP in 1986, there have been a number of changes introduced to the hydraulic, fuel price, customer load variation components of the RSP as well as to the RSP recovery/repayment provisions which have improved the functioning of the RSP. In Hydro's 2006 RSP Report, filed as Appendix B in the 2013 RSP proceeding, Hydro reviewed some of the changes that had been made and reviewed the adequacy of the then-existing provisions. In the Analysis section of the Report, page 14, Hydro concluded that the customer allocation for the load variation should be revised so that it is more closely aligned with Cost of Service treatment. That inadequacy is proposed to be dealt with in the current proceeding in that Hydro has proposed a change to the customer allocation for the load variation provision of the RSP such that both the revenue and the fuel components

## PUB-NLH-294 2013 NLH General Rate Application

## Page 2 of 2

- of the load variation are allocated between NP and IC based on customer energy
- 2 ratios.

Appendix A: RSP History - Activity and Balances

	17	(In thousands of dollars)										multiple 15	er 2 ger ibir
	Annual Activity Hydraulic Fuel Cost Load RRA Financing								(Recovery)/	Plan Balances			
1986	12,045	(11,814)	(2,506)	RRA	Financing	Other		Total	Refund	NP	IC	Hydraulic	Total
1987	54,280	(35,044)	the second second second second		267			(2,008)		(1,889)	(119)		(2,008
1988	(726)	THE RESERVED AND ADDRESS.	(1,582)		709	•		18,363	(68)	8,063	8,222		16,285
1989	The state of the s	(34,173)	62		170			(34,669)	(245)	(18,498)	(131)		(18,629)
1990	15,341	(33,097)	1,378		(3,508)			(19,886)	5,704	(31,004)	(1,807)		(32,811)
1991	13.619	3,175	(1,781)		(1.666)	8,941	1	22,288	10,010	(4,445)	3,932		(513)
	(2,757)	(4.853)	(3.054)		(326)			(10,990)	3,803	(10,530)	2,830		(7,700)
1992	(198)	3,469	1,482		(111)	6,488	2	11,130	664	593	3,505		4,098
1993	(4,668)	7,397	1,834	(26)	746			5,283	47	3,825	5,636		9,461
1994	(17,077)	3,509	2,315	(120)	32			(11,341)	(2,120)	(5,610)	1,573	inii -	(4,035)
1995	(3,733)	. 19,015	1,820	(134)	537	11		17,505	(694)	6,900	6,016		12,916
1996	(7,419)	21,805	2,441	(140)	2,005			18,692	(1,506)	21,002	9,160		30,162
1997	(8,545)	24,507	(560)	(478)	3,346			18,270	(7,103)	27,644	13,734		
1998	(967)	12,068	3,435	122	4,150			18,808	(11,227)	33,009	15,776		41,378
1999	(15,859)	9,128	5,050	(394)	3,223			1,148	(15,427)	21,436	12,892		48,785
2000	(16,614)	29,359	521	(880)	2,774	(862)	2	14,298	(13,734)	22,684		1 3	34,328
2001	5,243	56,879	(3,506)	125	4,438	(002)		63,179	(11,152)		12,056		34,740
2002	6,967	46,113	(5,313)	(326)	7,189	184	4	54,814	The second second second second second	60,300	24,768		85,068
2003	4,130	36,534	(2,846)	(227)	10,333	104	-		(13,921)	92,060	32,711		124,771
			(2,0-0)	(22/)	10,333			47,924	(16,669)	114,790	40,914		155,704
2004 Current	(7,362)	12,665	590	(949)	79	(12)	4	5,015	(1,951)	4,909	2 712	/E E211	2 101
Historical			A C. T.		10,459	5		10,464	(32,236)	The second section is	3,713	(5,521)	3,101
Total	(7,362)	12,665	590	(949)	10,538	(7)		15,479	(34,187)	101,660	32,273 35,986	(5,521)	133,933
					A STE			1000	(50,207)	100,505	33,360	(3,321)	137,034
2005 Current	(8,646)	16,289	(1,431)	(2,329)	(309)			3,574	(18,660)	120	(1,296)	(10,625)	(11,801)
Historical					8,768			8,768	(37,835)	79,781	25,086	(20,025)	104,867
Total	(8,646)	16,289	(1,431)	(2,329)	8,459			12,342	(56,495)	79,901	23,790	(10,625)	93,066
2006 Current	(10,678)	25,715	(11,442)	(4,337)	(2,067)			(2,809)	(35,396)	(10.260)	(24 405)	(15.070)	(40.555)
Historical				(4,557)	6,412	(10,000)		(3,588)	(38,285)	(19,268)	(14,406)	(15,978)	(49,652)
Total	(10,678)	25,715	(11,442)	(4,337)	4,345	(10,000)	°-	(6,397)	(73,681)	53,893 34,625	9,101 (5,305)	(15,978)	62,994 13,342
					10.5	,20,000,		(0,057)	(75,001)	34,023	(3,303)	(13,376)	15,542
2007 Current	(19,761)	(5,772)	(6,008)	1,862	(3,097)	(1,383)	6	(34,159)	23,918	(14,659)	(8,829)	(14,820)	(38,308)
Historical					1,972	(21,585)	7	(19,613)	(32,839)	12,053		THE STREET	12,053
Total	(19,761)	(5,772)	(6,008)	1,862	(1,125)	(22,968)		(53,772)	(8,921)	(2,606)	(8,829)	(14,820)	(26,255)
2008 Current	(26,383)	27,745	(10,341)	(245)	(2,937)	(2,238)		(14,399)	(440)	(10,330)	(11,994)	(30,903)	(53,227)
Historical					191	(2,200)		191	(14,482)	(10,330)	(11,354)	(30,303)	(33,227)
Total	(26,383)	27,745	(10,341)	(245)	(2,746)	(2,238)	-	(14,208)	(14,922)	(10,330)	(11,994)	(30,903)	(53,227)
								(,3-,500)	(2-1522)	(20,000)	(22,550)	(30,303)	(33,227)
2009 Current	(12,006)	(4,523)	(26,027)	(1,152)	(7,026)			(50,734)	(18,301)	(52,940)	(36,875)	(32,181)	(121,996)
Historical													
Total	(12,006)	(4,523)	(26,027)	(1,152)	(7,026)		-	(50,734)	(18,301)	(52,940)	(36,875)		

The information from this table for the years 1986 to 2005 was obtained from the June 30, 2006 report "Review of the Operation of the Rate Stabilization Plan For the Period January 1, 2004 to December 31, 2005". Appendix A: RSP History - Activity and Balances. For the years 2006 - 2009 the information was obtained from the December 31st RSP reports prepared by Hydro.

- Note 1: This is the 1989 PDD loss be applied against the RSP.
- Note 2: This is the 1991 retail cost deferral.
- Note 3: This is the correction of industrial Rural deficit allocation.
- Note 4: These are billing adjustments.
- Note 5: This is the \$10 million contribution from the Government of Newfoundland and Labrador towards the Industrial Customers Historical balance.
- Note 6: This is the balance in the industrial Customers Historical Account that was transferred to the Current Plan at the expiration of the Historical Plan on December 31, 2007.
- Note 7: This represents the Hydraulic Balance as of December 31, 2006 that was allocated to the Historical Plans (NP and the Industrial Customers). This was approved by the Board in P.U. 8 (2007) that was issued April 12, 2007. Hydro revised the opening 2007 balances to account for this allocation.
- Note 8: This is the balance in the NP Historical Account that was transferred to the Current Plan at the expiration of the Historical Plan on June 30, 2008.