

IN THE MATTER OF the
Public Utilities Act, RSNL 1990,
Chapter P-47 (the *Act*) as amended; and

IN THE MATTER OF a general rate
Application (the "Application")
by Newfoundland Power Inc.
("Newfoundland Power") to establish
Customer electricity rates for 2013 and 2014.

**Requests for Information by
The Consumer Advocate**

CA-NP-530 to CA-NP-616

November 13, 2012

1 CA-NP-530 [Net Salvage] – In response to CA-NP-051, the Company states that it
2 was determined in many cases that the breakdown of required
3 contributions was not reflected in the Company's accounting records and
4 as a result salvage and retirement funds were credited to the general
5 CIAC revenue account. In addition, it is stated that the study was
6 completed based on an estimate of what the depreciation reserve in net
7 salvage would have been if the detailed breakdown of the contributions
8 had been reflected in accounting records. At this time, please provide the
9 specific estimates, by account. Further, provide a detailed narrative
10 identifying how each of the values were estimated, along with all actual
11 analyses performed, including all assumptions, considerations, and
12 material reviewed and/or relied upon in sufficient detail to permit
13 verification of the calculations. All calculations should be provided on
14 electronic medium in Excel readable format.

15
16 CA-NP-531 [Account 379.2] – For each of the software systems identified in
17 response to CA-NP-097 Attachment A, please state whether the software
18 system has been retired subsequent to 2010 and provide all plans and
19 corresponding support associated with any plans to retire any of the

software systems. Further, specifically indicate the year the software system is anticipated to be retired.

CA-NP-532 [Account 379.2] – For each software system identified in Attachment A in response to CA-NP-097 that is in excess of \$300,000, please provide the specific name and model number of the software system, the vendor, the specific purpose of the software, the version of the software, and whether the vendor has specifically informed the Company that it will no longer support the software.

CA-NP-533 [Account 379.2] – Note A in the summary of the Gannett Fleming Study for Account 379.2 notes that the amortization rate is applicable to vintages that are not fully amortized. At this time, please identify each software system that is fully amortized, the month and year the system became fully amortized, and which systems have become fully amortized subsequent to December 31, 2010. Further, identify the month and year that each such system became fully amortized. Finally, provide on electronic medium in Excel readable format the current reserve level for each software system and the date each software system will be fully amortized. The information should be provided on electronic medium on Excel readable format.

CA-NP-534 [Labor Charges] – In response to CA-NP-060 Attachment A at page 2, the Company states that percentages have been developed for allocating labor charges to retirements where replacement occurs. At this time, please provide all support and justification for the 25% and 50% values. This response should include all workpapers, assumptions, considerations, and all material reviewed and/or relied upon in sufficient detail to permit verification of the results.

CA-NP-535 [Account 363] – In response to CA-NP-072, the Company identified retirements by type of street light. Please provide the reason for the 2002 retirement of 9,397 street lights corresponding to \$1.1 million.

1 CA-NP-536 [Account 363] – In response to CA-NP-072, the Company identified
2 retirements by type of street light. Please provide the reason for the
3 2001 retirement of 1,516 high-pressure sodium vapor lamps in the
4 amount of \$616,000.
5

6 CA-NP-537 [Account 363] – In response to CA-NP-072, the Company identified
7 retirements by type of street light. Please provide the reason for the
8 2003 through 2010 retirement of 100-Watt high-pressure sodium vapor
9 lights.
10

11 CA-NP-538 [Account 363] – Regarding the retirements of street lights set forth in
12 response to CA-NP-072, please identify which street lights were
13 associated with the sale of street lights to any entity. Further, provide the
14 corresponding dollar amount and year of installation and year of
15 retirement.
16

17 CA-NP-539 [Account 363] – Please state the Company's policy regarding its plans to
18 phase out any type of street light and the corresponding underlying
19 reason and projected dates of retirements.
20

21 CA-NP-540 [Account 361.2] – In response to CA-NP-111, the Company states that
22 the historical data indicates a longer life than the 40-year estimate in the
23 2005 study. However, it also claims that an increase beyond 45 years is
24 not warranted at this time. Given the observed life table at page A-72 of
25 the Gannett Fleming Study which includes the retirement activity
26 associated with the underground conductors that experience premature
27 failures, provide all support and justification why an average service life
28 beyond 45 years is not warranted at this time. To the extent the Company /
29 relies on expectations that at some point in the future retirements will
30 return to their pre-1990 levels, provide all support and justification for
31 such position, along with all analyses performed to demonstrate the
32 validity of such claim.
33

1 CA-NP-541 [Account 361] – In response to CA-NP-118, the Company states that the
2 trends in removal costs of gross salvage are primarily due to inflationary
3 pressure and higher average service lives. At this time, provide all
4 support and justification for such claim. Further, specifically explain why
5 such inflationary pressure and higher average service life considerations
6 are not also applicable to the retirement activity reflected in 2002 and
7 2003 retirements on page B-12 of the Gannett Fleming Study.

8
9 CA-NP-542 [Account 371] – In response to CA-NP-121, the Company identifies the
10 sale of six buildings with a corresponding overall substantial level of
11 positive net salvage. Given the Company's historical experience, provide
12 all support and justification for the assumed zero (0) level of net salvage
13 for large buildings and a -5% net salvage for small buildings.

14
15 CA-NP-543 [Net Salvage] – In response to CA-NP-122, the Company provides
16 adjusted net salvage information due to its new capitalization policy. At
17 this time, please provide all workpapers, assumptions, considerations,
18 and material reviewed and/or relied upon in sufficient detail to permit
19 verification of the reasonableness of the percent reductions provided.
20 Further, provide all support and justification supporting why the Company
21 believes its pro forma amounts reflect reasonable and appropriate levels
22 for depreciation purposes.

23
24 CA-NP-544 [Account 323] – In response to CA-NP-088 at page 18 of the Hydro Plant
25 Depreciation Study Inspection Reports 2010, the Company states that in
26 addition to planned capital replacement to major components, it has also
27 undertaken initiatives to extend the life of existing assets. Please
28 specifically identify what retired in age brackets 33.5, 38.5, 45.5, 46.5,
29 and 47.5 years of age for Account 323 as set forth on pages A-12 and
30 A-13 of the Gannett Fleming Study. The response should specifically
31 identify and support why such retirement activity at these given ages are
32 indicative of future expectations, specifically referencing the statement on
33 page 4 of the same Hydro Inspection Report that in 2001 there has been
34 an increased focus on asset management for hydro plant.

1
2 CA-NP-545 [Account 324] – Given the Company's statement in response to
3 CA-NP-088 that the Company has implemented an asset management
4 program for hydro generating facilities and the statement in response to
5 CA-NP-084 that service life indications are 70 to 75 years with a low
6 modal curve for Account 324, please explain and justify why the
7 Company selected a 70S0.5 life-curve combination which begins to
8 deviate from historical experience at approximately 55 years of age as set
9 forth on page A-15 of the Gannett Fleming Study. Further, provide all
10 support and justification why a 75- or 80-year average service life is not
11 also reasonable and appropriate.
12

13 CA-NP-546 [Account 362.1] – In response to CA-NP-084, the Company states that
14 there was an accounting change in 2004 that impacted life expectations
15 for distribution poles. At this time, please identify the specific accounting
16 change referenced, providing what accounting transactions were before
17 the change and what the equivalent transactions were after the change.
18 Further, specifically state if the reversion back in 2011 to retiring specific
19 poles puts into place the identical accounting system that was in effect
20 prior to 2004. If not, identify all differences.
21

22 CA-NP-547 [Account 362.1] – Please identify the number of poles treated with CCA
23 versus those treated with Penta, and when each treatment was first
24 initiated as it applies to distribution poles.
25

26 CA-NP-548 [Account 378.2] – Please state if the Company has purchased all its
27 vehicles during the past 20 years or whether it has leased vehicles during
28 such period. To the extent the Company has leased vehicles set forth in
29 Account 378.2 during the past 20 years, state when the Company began
30 the leasing process, and when it ended the leasing process, as well as
31 the number, type of vehicles, and corresponding purchased costs during
32 the timeframe when the Company was leasing vehicles. The information
33 should be provided on electronic medium in Excel readable format.
34

1 CA-NP-549 [Account 378.2] – Please state if the Company has a specific policy
2 addressing when it retires vehicles in Account 378.2. Further, provide
3 such policy.
4

5 CA-NP-550 [Account 378.2] – Please state which vehicles retired during the past 10
6 years in Account 378.2 were disposed of as a wrecked vehicle. Further,
7 provide the original cost and the retirements by year associated with
8 wrecked vehicles for the past 10 years.
9

10 CA-NP-551 [Account 378.2] – Please identify the process employed by the Company
11 to dispose of vehicles accounted for in Account 378.2 (all auctioned off,
12 sold to Company employees, etc.).
13

14 CA-NP-552 [Account 379.1] – In response to CA-NP-084, no reference is made to the
15 basis for establishing the amortization period for Account 379.1 –
16 Computer Hardware. At this time, provide all support and justification for
17 the assumed 5SQ life-curve combination for computer hardware. The
18 response should specifically address the fact that the Gannett Fleming
19 Study identifies \$1.4 million of investment in Account 379.1 associated
20 with plant placed in service in 2005 as noted on page C-107 of the Gannett
21 Fleming Study.
22

23 CA-NP-553 [Account 379.1] – Please identify the plant in service by vintage as of the
24 most current date available in 2012 for Account 379.1 – Computer
25 Hardware.
26

27 CA-NP-554 [Account 379.1] – Please provide the dollars by vintage that were fully
28 amortized as of December 31, 2010 and currently.
29

30 CA-NP-555 [Account 379.2] – Please provide the surviving balance by vintage for
31 investment in Account 379.2 – Computer Software through the most
32 current period available in 2012.
33

1 CA-NP-556 [Account 342] – Please identify the number and corresponding dollar
2 value of transformers that contain PCB levels that require removal in the
3 near future.

4
5 CA-NP-557 [Account 342] – Please identify the number of transformers and the
6 corresponding dollar value of each transformer retired by year for the past
7 10 years that were retired due to the level of PCB contamination.

8
9 CA-NP 558 Further to the reply to CA-NP 125, please confirm that customers
10 choosing electric hot water and/or heat see significant savings over a
11 furnace oil alternative under both current and proposed rates, but the
12 marginal cost of supplying hot water and heat to these customers is much
13 higher for electricity than furnace oil. Is it fair to say that the electricity
14 consumers on the Island Interconnected System are providing a
15 significant subsidy to new customers choosing electric hot water or
16 heating?

17
18 CA-NP 559 Further to the reply to CA-NP 125, please provide the capital and
19 installation costs of new electricity and furnace oil hot water and heating
20 systems.

21
22 CA-NP 560 Further to the reply to CA-NP 126, please provide an explanation of why
23 revenues/employee (FTE) are forecast to increase 25% by 2014 over
24 2007 levels, while sales/employee and customers/employee are forecast
25 to increase by only 9% and 6%, respectively.

26
27 CA-NP 561 CA-NP 134 asked how NP's composite labour rate increases compare to
28 labour rate increases for electric utilities elsewhere in Canada. The
29 information was not provided. Please reproduce Table 2-5 using a
30 Canadian utility labour cost index as being representative of inflation.

31
32 CA-NP 562 Further to the reply to CA-NP 140, please define "percentage of installed
33 value of the system".
34

1	CA-NP 563	Further to the reply to CA-NP 144, when does NP expect to provide its
2		customers with a net metering option?
3		
4	CA-NP 564	Further to the reply to CA-NP 148, NP indicates that its single supply
5		dependence is relatively rare for investor-owned electric utilities in
6		Canada. Please provide a list of other utilities in Canada with a single
7		supply source.
8		
9	CA-NP 565	Further to the reply to CA-NP 163, is 2009 the most recent year for which
10		data are available relating to the allowed ROE for Canadian Niagara
11		Power? What is Canadian Niagara Power's current ROE?
12		
13	CA-NP 566	Further to the reply to CA-NP 168, is NP promoting development of
14		distributed resources and if not, why not?
15		
16	CA-NP 567	Further to the reply to CA-NP 169, how does NP determine if its losses
17		are reasonable and if capital or O&M expenditures are justified to improve
18		or maintain current levels of losses?
19		
20	CA-NP 568	Further to the reply to CA-NP 165, it is indicated that data for the US peer
21		group and for NP are adjusted for inflation and put into 2009\$ (in the 2011
22		report) and 2010\$ (in the 2012 report). Please explain how this is done
23		and provide an example.
24		
25	CA-NP 569	Further to the reply to CA-NP 165, reliability data are shown for the CEA
26		both with and without significant events. Why are NP data not shown both
27		with and without significant events?
28		
29	CA-NP 570	Further to the reply to CA-NP 165, it is stated that U.S. peer group trends
30		have been relatively stable early in the reporting period, but increasing in
31		recent years. It is stated that this is due largely to reduced sales since
32		2007. What has been the annual sales growth in the U.S. peer group
33		since 2007? Are there any other reasons why costs might be increasing

1 in the U.S. peer group; i.e., cost increases to improve customer service
2 and be more responsive to customer needs?
3

4 CA-NP-571 Reference Answer of Dr. Vander Weide to PUB-NP-102 and CA-NP-259:
5 Please confirm that in the ROEs column neither Enbridge Gas
6 Distribution Inc (EGDI) nor Union Gas were allowed an ROEs of 9.42%
7 and 9.58% respectively by EB-2009-0084, since both were under five
8 year settlements that fixed their ROEs independent of the OEB formula
9 ROE.
10

11 CA-NP-572 Reference Answer of Dr. Vander Weide to PUB-NP-102 and CA-NP-259:
12 Please provide the actual authorised ROEs for 2010, 2011 and 2012 for
13 EGDI and Union Gas.
14

15 CA-NP-573 Reference Answer of Dr. Vander Weide to CA-NP-208: Please confirm
16 that S&P will not rate an operating subsidiary higher than its parent
17 unless it is ring fenced so, for example, the ratings attached to Union Gas
18 are that for Spectra and that for NSPI for Emera. If not, why not?
19

20 CA-NP-574 Reference Answer of Dr. Vander Weide to CA-NP-208: Please provide
21 the DBRS bond ratings for the Canadian companies in this table.
22

23 CA-NP-575 Reference Answer of Dr. Vander Weide to CA-NP-216: Would
24 Newfoundland Power please provide the requested NEB decision, so it is
25 a part of the evidentiary record in this hearing?
26

27 CA-NP-576 Reference Answer of Dr. Vander Weide to CA-NP-218: Would
28 Newfoundland Power please provide the requested OEB decision, so it is
29 a part of the evidentiary record in this hearing.
30

31 CA-NP-577 Reference Answer of Dr. Vander Weide to CA-NP-216: Would
32 Newfoundland Power please provide the requested BCUC decision, so it
33 is a part of the evidentiary record in this hearing.
34

1
2 CA-NP-578 Reference Answer of Dr. Vander Weide to CA-NP-272: Would Dr.
3 Vander Weide please provide the requested concordance in the same
4 format as that provided by Ms. McShane in answer to CA-NP-365b
5

6 CA-NP-579 Reference Answer of Ms. McShane to CA-NP-374: Please confirm that
7 Ms. McShane is not aware of any academic articles published in peer
8 reviewed academic journals that estimate the market risk premium by
9 looking at income returns rather than the overall return from investing on
10 bonds.
11

12 CA-NP-580 Reference: Answer of Ms. McShane to CA-NP-370: Ms. McShane in
13 answer to g) judges NP to be an average risk utility overall. She states
14 that NP's application and previous Board decisions bear this out. Given
15 that Newfoundland Power has a 45% common equity ratio, whereas most
16 other Canadian electric transmission and distribution utilities have about
17 40% would both Newfoundland Power and Ms. McShane therefore judge
18 Newfoundland Power to have above average business risk offset by
19 below average financial risk?
20

21 CA-NP-581 Reference: Answer of Ms. McShane to CA-NP-370: Please indicate
22 what factors lead Ms. McShane to judge Newfoundland Power to have
23 above average business risk compared to other Canadian electricity
24 companies such as Maritime Electric with 40% common equity and Nova
25 Scotia Power Inc. with 37.5% common equity.
26

27 CA-NP-582 Reference: Answer of Ms. McShane to CA-NP-370: Please indicate
28 what incremental ROE Ms. McShane would judge Newfoundland Power
29 to warrant should the Board deem Newfoundland Power a 40% common
30 equity ratio? Please provide all calculations.
31

32 CA-NP-583 Further to CA-NP-187, in Dr. Vander Weide's opinion, do Canadian
33 utilities have a greater opportunity to earn allowed ROEs than US
34 utilities? Please state reasons for Dr. Vander Weide's response.

1
2 CA-NP-584 Further CA-NP-189, does Dr. Vander Weide know or has he studied
3 which of the utilities he has found comparable to Newfoundland Power
4 have experienced cost disallowances by their respective regulator over
5 the past three years.
6

7 CA-NP-585 Further to Dr. Vander Weide's reply to CA-NP-223, would Newfoundland
8 Power please locate Dr. Vander Weide's direct and rebuttal evidence
9 before the Alberta proceeding and file a copy of same in this proceeding.
10

11 CA-NP-586 Further to CA-NP-239 addressed to Dr. Vander Weide, how is the fact
12 that many electric utilities in the United States are increasing their capital
13 expenditures to meet demand growth and satisfy environmental
14 requirements impacting their business risk?
15

16 CA-NP-587 Further to CA-NP-245 addressed to Dr. Vander Weide, does Dr. Vander
17 Weide believe that risk premia based on Canadian market data would be
18 more relevant than using the Ibbotson SBBI risk premium derived from
19 US market data in the context of this case?
20

21 CA-NP-588 Further to CA-NP-253, what are the current allowed returns for the utilities
22 listed therein?
23

24 CA-NP-589 At Exhibit 16 to Dr. Vander Weide's evidence, he provides allowed
25 returns for the utilities listed therein. At Exhibit 16 to Dr. Vander Weide's
26 evidence, he provides allowed returns on equity for US electric utilities
27 over the period January 2010 to June 2012 based upon data from
28 Regulatory Research Associates, SNL Financial, July 5, 2012. He
29 provides similar data in Exhibit 17 for US natural gas utilities over the
30 same period. In the Regulatory Research Associates' State Regulatory
31 Evaluations dated January 19, 2012 reproduced at CA-289, it states at
32 the top of page 4, "... a utility may be authorized a relatively high ROE
33 but factors, eg, capital structure changes, the age or 'staleness' of the test
34 period, rate base and expense disallowances, the manner in which the

1 commission chooses to calculate test year revenue, and other
2 adjustments, may render it unlikely that the company will earn the
3 authorized return on a financial basis. Hence, the overall decision may
4 be negative from an investor point of view, even though the authorized
5 ROE is equal to or above the average. (RRA's rate case final reports
6 provide a detailed analysis of each fully-litigated commission decision.)"
7 Can Dr. Vander Weide provide data as to how the allowed ROEs
8 compared to actual earned ROEs in relation to his Exhibit 16 and 17?
9

10 CA-NP-590 Further to CA-NP-290, can the requested material be filed on
11 Newfoundland Power's stranded website as is being done in the case of
12 other RRA documentation such as that provided in response to
13 CA-NP-291?
14

15 CA-NP-591 Further to CA-NP-291, the October 4, 2012 report of Regulatory
16 Research Associates states, "As a result of electric industry restructuring,
17 certain states unbundled electric rates and implemented retail competition
18 for generation." Would Ms. McShane please explain how this
19 development has affected the risk of the electric utilities operating in
20 these states and please provide information as to which states this
21 development has occurred in?
22

23 CA-NP-592 Further to Ms. McShane's reply to CA-NP-292, does Ms. McShane have
24 a subscription from SNL Financial which would allow her access to RRA
25 rate case final reports for each of the latest cases involving utilities in her
26 sample in this proceeding? Can these documents be provided by way of
27 a posting to Newfoundland Power's stranded website?
28

29 CA-NP-593 In the Standard and Poor's report entitled Assessing US Utility Regulatory
30 Environments dated November 7, 2007 and republished on November
31 15, 2011 and filed in reply to CA-NP-300, Standard and Poor's states at
32 page 4, "Notably, the analysis does not revolve 'authorized' returns, but
33 rather on actual earned returns. We note that many examples of utilities
34 with healthy authorized returns that, we believe, have no meaningful

1 expectation of actually earning that return because of rate case lag,
2 expense disallowances, etc.” Does Dr. Vander Weide and Ms. McShane
3 agree with this observation and how have they taken it into account in
4 assessing the cost of equity for Newfoundland Power compared to
5 American utilities?
6

7 CA-NP-594 Further to the reply to CA-NP-304, Ms. McShane states in that response
8 that Canadian regulators have been increasingly moving toward
9 performance based regulation. Where in Canada have regulators been
10 increasingly moving towards performance based regulation and how has
11 that form of regulation affected and/or how is it expected to affect the
12 regulated utilities ability to earn the allowed return from year to year.
13

14 CA-NP-595 Further to the reply to CA-NP-329, please name any utility(ies) in Ms.
15 McShane’s sample whose regulated subsidiaries are subject to a historic
16 test year.
17

18 CA-NP-596 Further to the reply to CA-NP-337, would Newfoundland Power please
19 quantify in dollar terms the amount of risk Newfoundland Power Inc. was
20 exposed to for each of the five years prior to the PEVDA?
21

22 CA-NP-597 How has the increasing number of customers from 2010 to 2014 (f) (i.e.
23 243,426 to 257,267) impacted Newfoundland Power’s Operating Labour
24 Cost?
25

26 CA-NP-598 Further to CA-NP-427, 2011 and 2012 had 23 and 24 retirements
27 respectively. Out of each of these years, how many employees retired
28 early versus took a normal retirement?
29

30 CA-NP-599 Given the history of retirement at Newfoundland Power, in terms of the
31 number of those who choose to retire early, why does Newfoundland
32 Power’s 2013 and 2014 Internal Labour forecasts only base retirement
33 estimates upon employees who reach age 65 or who have reached age
34 60 with the combination of 95 years of age plus service?

1
2 CA-NP-600 Further to CA-NP-427, would Newfoundland Power please re-state Table
3 1 to 7 to reflect retirement eligibility data based on normal retirement
4 under the Newfoundland Power Retirement Incentive Plan (i.e. reaching
5 age 65, or age 60 with combination of 95 years of age plus service).
6

7 CA-NP-601 Further to CA-NP-428, as per that reply, Newfoundland Power is
8 forecasting 29 new hires in 2013 and 35 new hires in 2014. For each
9 year, which of these new hires (by position) are forecast to replace a
10 retiring employer and which are not new hires to replace a retiring
11 employee?
12

13 CA-NP-602 Further to the previous question, what is the forecast salary differential
14 between the new hire's salary (by position) and the retiring employee's
15 salary and what is the assumed date of hire and date of retirement of the
16 departing employee in each case?
17

18 CA-NP-603 As indicated in reply to CA-NP-428, Newfoundland Power forecasts 29
19 new hires in 2013 and 35 new hires in 2014. Please explain how these
20 forecasts have been incorporated into and reconcile with Newfoundland
21 Power's 2013 and 2014 Internal Labour Forecasts filed respectively at Vol
22 II, Tab 2 and in reply to CA-NP-437.
23

24 CA-NP-604 Further to CA-NP-435, how many employees are considered (through
25 information gained from retirement planning consultations) as likely to
26 retire in 2013 and 2014. Of these likely retirees, how many have
27 reached full retirement eligibility versus early retirement eligibility.
28

29 CA-NP-605 Further to the replies to CA-NP-435 and 436, please reconcile the
30 statement that "likely retirements are included in company forecasts" with
31 footnote 18 of the 2013 Internal Labour Forecast and footnote 1 of the
32 2014 Internal Labour Forecast which states, "Retirement estimates are
33 based upon employees reaching age 65, or have reached age 60 with the
34 combination of 95 Years of age plus service."

1
2 CA-NP-606 For each of 2013 (f) and 2014 (f), please provide a table showing:

3 a) Position

4 b) Age

5 c) Years of Service

6 d) Date in 2013 (or 2014, as the case may be) by which the
7 Newfoundland Power employee will reach age 65 or
8 reaches age 60 with combination of 95 years.
9

10 CA-NP-607 Further to CA-NP-439, the Hay Group's letter of October 14, 2011
11 estimated market actual salary levels in 2012 for numbers of the
12 executive group. Has Newfoundland Power requested a further report
13 from Hay Group for 2013 and when is it expected?
14

15 CA-NP-608 The reply to CA-NP-447 states an average annual increase for the
16 President and Vice-Presidents compensation over 2000 to 2014 (f),
17 including 2010 onward when there was a reduction to 4 executives. Can
18 Newfoundland Power re-state this table to include only the President and
19 the 3 current Vice President positions from 2001 onward.
20

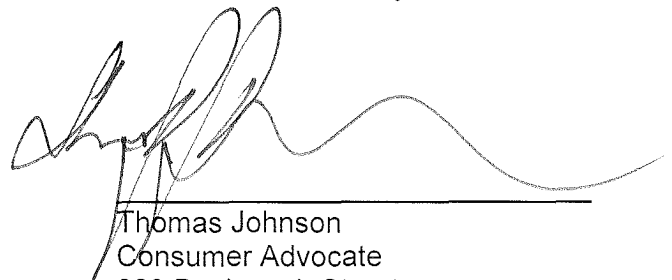
21 CA-NP-609 Further to CA-NP-447, please re-state Table 2 for the period 2005 to
22 2014 (f), a period where there is a consistent number of managers (i.e. 9).
23

24 CA-NP-610 The reply to CA-NP-447 states in footnote 1 that "Base salaries for the
25 President and Vice Presidents are established by Newfoundland Power's
26 Board of Directors which has not yet considered 2013 and 2014 salaries."
27 When will the same be established and what are the individual salaries of
28 the executives assumed to be for the purposes of providing the data for
29 2013 and 2014 in Table 1 in CA-NP-447.
30

31 CA-NP-611 Further to CA-NP-451, when and why were the target percentage
32 payments for the executive changed and what impact has this change
33 had on the amount of remuneration paid since adopted.
34

1 CA-NP-612 Further to CA-NP-452, is Newfoundland Power aware of any other
2 Canadian regulatory precedents whereby the factor of the utility's
3 corporate earnings are a basis upon which utility customers bear the cost
4 of S.T.I. pay?
5
6 CA-NP-613 Further to Newfoundland Power's reply to CA-NP-457, how does
7 Newfoundland Power's policy of allowing "Other key employees" use of
8 unmarked company vehicles after hours compare with other Canadian
9 utilities?
10
11 CA-NP-614 Further to CA-NP-478, for 2010 to 2014 (f) what is the breakdown of
12 Standby Costs between Union and Management Employees?
13
14 CA-NP-615 Further to CA-NP-479, are there always a set number of managerial
15 employees who are on standby? Please explain to which managerial
16 employees, stand by duty is assigned and how standby duty is assigned
17 (e.g. is it rotated?).
18
19 CA-NP-616 Further to CA-NP-482, what are the costs for in relation to the Rattling
20 Brook Fishway in 2013 (f) and 2014 (f)?
21

Dated at St. John's, in the Province of Newfoundland and Labrador, this 13th day of November, 2012.



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