- Q. [ELG] Please state whether the Company's reliance on the ELG calculation procedure for depreciation purposes is mandatory or optional. To the extent optional, please provide all support and justification for selecting the ELG calculation procedure.
- 6 A. In Order No. P.U. 47 (1982), the Board ordered the use of the unit summation (ELG) procedure to calculate rates of depreciation for all of Newfoundland Power's plant in service.

In 1967, following the amalgamation of 5 utilities to form what is now Newfoundland Power, the initial accumulated depreciation and annual rates of depreciation for the new company were those approved by the Board for the former Newfoundland Light & Power Co. Limited. In 1977, the Company presented a complete depreciation study for the amalgamated companies that involved establishing accumulated depreciation and depreciation rates based on the average life procedure for plant in service as of December 31, 1977, and based on the unit summation procedure for property added on or after January 1, 1978. In Order No. P.U. 34 (1977), the Board approved the depreciation study presented by the Company, including the use of both average life procedure and unit summation procedure, respectively.

In 1978, the question of average life and unit summation based rates of depreciation was considered again by the Board and, in Order No. P.U. 20 (1978), the use of both average life procedure and unit summation procedure was ordered. Rates of depreciation approved in Order No. P.U. 20 (1978) were continued by the Board in Order No. P.U. 21 (1980).

A new depreciation study was presented to the Board in 1981. In Order No. P.U. 37 (1981), the Board ordered that at its next hearing the Company would be required to justify the use of normalized income tax accounting in conjunction with the unit summation procedure. At the next hearing, in 1982, the Company addressed the matter in its evidence and, in Order No. P.U. 47 (1982), unit summation based rates of depreciation were approved for all plant in service effective January 1, 1983.

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The 5 utilities that were amalgamated were Newfoundland Light & Power Co. Limited, Union Electric Light & Power Company, United Towns Electric Company Limited, Public Service Electric Company Limited and West Coast Power Company Limited.