1Q.McShane Evidence – In light of the Board's statements in P.U. 43 (2009) at p. 17,2please fully explain the basis for Ms. McShane's opinion that her newly constructed3sample should be considered by the Board to be comparable to Newfoundland4Power.55

6 A. To assess comparability of investment (equity) risk, it is critical to recognize that it is a 7 function of all three elements of risk, business, regulatory and financial. In Ms. 8 McShane's view, the financial risk element of investment risk has been largely 9 overlooked in the comparability assessment. Nevertheless, to address the PUB's 10 concerns, Ms. McShane applied additional selection criteria, specifically a Moody's rating criteria that required the selected companies have a Moody's rating no lower than 11 12 Newfoundland Power's Baa1 issuer rating and a cut-off point for percentage of 13 unregulated assets.