

1 **Q. Further to the reply to CA-NP 165, it is stated that U.S. peer group trends have been**
2 **relatively stable early in the reporting period, but increasing in recent years. It is**
3 **stated that this is due largely to reduced sales since 2007. What has been the annual**
4 **sales growth in the U.S. peer group since 2007? Are there any other reasons why**
5 **costs might be increasing in the U.S. peer group; i.e., cost increases to improve**
6 **customer service and be more responsive to customer needs?**

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8 A. Table 1 provides the retail sales by year from 2007 to 2010 for the U.S. peer group upon
9 which the information provided in the reports provided in Attachment A of the response
10 to the Request for Information CA-NP-165 (the “Peer Group Reports”) is based.
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Table 1
U.S Peer Group Sales

Year	Retail Sales (GWh)
2007	156,565
2008	142,828
2009	134,798
2010	158,033

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15 Table 1 shows that between 2007 and 2010 retail sales for the U.S. peer group increased
16 from 156,565 GWh to 158,033 GWh, an average annual increase of 0.3%. The large
17 increase in the 2010 retail sales figure over 2009 is a direct result of a significant change
18 in one of the utilities included in the U.S. peer group.
19

20 In 2010, three Illinois electric and natural gas delivery companies, including Central
21 Illinois Public Service Company, one of the U.S. peer group utilities, were merged into
22 one legal entity called Ameren Illinois. Commencing with the Peer Group Report filed
23 with the Board on February 6, 2012, Ameren Illinois replaced Central Illinois Public
24 Service Company in the U.S peer group.
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26 The difference between the 2009 retail sales of Central Illinois Public Service Company
27 and the 2010 retail sales of Ameren Illinois is 31,419 GWh. With this difference in sales
28 subtracted, the 2010 retail sales figure in Table 1 would be 126,614 GWh, which is
29 indicative of a continuous decline in aggregate peer group retail sales for the period 2007
30 through 2010.
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32 The Peer Group Reports are prepared using data filed with the Federal Energy Regulatory
33 Commission (“FERC”) that allow some high level comparisons to be made. However,
34 the FERC data does not contain sufficient information to enable the sort of detailed

- 1 assessment of U.S. utility matters that is requested in the question, and Newfoundland
- 2 Power does not have other information upon which to base such an assessment.