

1 Q. Assuming that the \$49 million credited to the IC RSP was to be allocated among all
2 of the current Industrial Customers, based on respective sales by Hydro to the
3 current Industrial Customers in the January 1, 2008 to August 31, 2013 period, both
4 in respect of the IC RSP deficit (at the \$39 million estimated by Hydro or at the
5 finalized deficit amount, if available) and in respect the remaining IC RSP surplus
6 balance (at the \$10 million estimated by Hydro or at the finalized surplus amount, if
7 available), please prepare a table similar to that prepared by Hydro in response to
8 PUB-NLH-25 in the 2009 RSP Application (but in accordance with the foregoing
9 assumptions omitting Newfoundland Power and Abitibi, and adding Vale and
10 Praxair) setting out the respective shares (based on a respective January 1, 2008 to
11 August 31, 2013 period sales allocation, per the foregoing assumptions) of each
12 current Industrial Customer in the IC RSP deficit and in the remaining IC RSP surplus
13 balance.

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16 A. With regard to the amount of \$49 million, OC2013-089, as amended, prescribes the
17 following:

- 18 (i) \$49 million of the Rate Stabilization Plan Surplus is to be credited to the IC
19 RSP with the balance transferred to the NP RSP;
20 (ii) the amount of \$49 million is the estimated RSP amount required to phase-in
21 Industrial rates based on Hydro's General Rate Application;
22 (iii) the amount of \$49 million will not be adjusted in the future; and
23 (iv) the amount of \$49 million will be used to fund the shortfall in Hydro's
24 revenues as a result of the IC rate phase-in.

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26 As outlined in (iii) above, the amount of \$49 million is the estimated RSP amount
27 required to phase-in Industrial rates based on Hydro's General Rate Application.

1 Since the amount of \$49 million, and its use, is integral to the rates policy direction
2 given in the OC it should not be altered by redistributing over the period from
3 January 1, 2008 to August 31, 2013 by a method which contravenes that given in
4 the Government directive. Therefore, it is Hydro's position that interim rates over
5 the period January 1, 2008 to August 31, 2013, and related matters, should be
6 finalized at this time without further review. Refer also to the response to CA-NLH-
7 20.