Q. Re: V-NLH-1. The net effect of Hydro having a load variation provision in the RSP is that Hydro is not exposed to financial risks related to changes in load. This provision was first implemented in 1992 (V-NLH-2) and remains in place in the same substantive form in terms of the effects on Hydro's net income due to load changes. Question: Please provide, for each year since 1992, the actual and/or approved Hydro net income or return on equity including as proposed for the test years. Please indicate if this change in the scale of shareholder returns to equity indicates a potential shift

in the purpose and necessity of a load variation provision being included at all in the

Α.

RSP.

Hydro agrees that one effect of having a load variation provision in the RSP is that Hydro is not exposed to energy-cost related financial risks related to changes in load. Hydro is not, however, equally protected from financial risks related to changes in demand. Hydro submits that the larger purpose of the load variation, particularly at times when the price of fuel greatly exceeds the energy rate charged to its customers, is to protect both customers and Hydro from fuel cost variations related to load. For instance, the load variation for the IC class has been approximately \$25 million in recent years. That load variation represents fuel savings which could have been considered a windfall to Hydro, as Hydro's overearnings provision would have permitted the company to retain savings where the overearnings threshold was not exceeded. Hydro would be exposed to similar risk if a significant increase in load occurred. Hydro does not, therefore consider that the scale of shareholder returns to equity indicates a potential shift in the purpose and necessity of a load variation provision being included at all in the RSP.

RSP Rules and Components to be charged to Industrial Customers

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- 1 It should be noted that the load variation was implemented in 1986. Please see the
- 2 attachment for Hydro's financial results since 1986. Please also refer to the
- 3 response to CA-NLH-17.

Newfoundland and Labrador Hydro Net Income 1986 to 2012 \$ millions 1986 36.5 1987 43.4 41.2 1988 1989 23.9 1990 21.7 1991 23 1992 24.7 24.9 1993 1994 17.1 43.4 1995 28.9 1996 43.4 1997 1998 70.1 1999 51.6 2000 34.8 2001 11.9 9.7 2002 2003 -2.6 2004 7.3 2005 3.3 2006 -6.9 2007 2.9

IC-NLH-27

Attachment 1

9.1

18

6.5

20.6

17.0

2008

2009

2010

2011

2012

[†] Prior to 2005, the net income is total Hydro, including non-regulated.