Q. At page 5 of Order No. P.U. 39(2014) in relation to Newfoundland and Labrador 1 2 Hydro - Second Application for the Interim Approval of Customer Electricity Rates 3 for 2014, the Board stated: "Hydro further explains that its 2014 financial outlook has changed materially 4 5 since the filing of the general rate application forecast, noting that additional 6 supply costs of \$10 million were incurred in the first quarter of 2014, Hydro also 7 states that it will incur additional costs in 2014 associated with the Board's 8 ongoing review of the Island Interconnected System supply issues and power 9 outages. Hydro submits that the Application demonstrates its requirement for 10 additional revenue in 2014 and balances the objectives of reasonable cost 11 recovery and customer impacts." 12 And at page 11, the Board indicated: 13the approval of interim relief in advance of the conclusion of a general rate. 14 application is an extraordinary measure which must be fully justified in the circumstances. Hydro now advises that its 2014 financial outlook has changed 15 16 materially since the filing of the general rate application and that it plans to file an amended general rate application with updated forecasts. The Board finds that 17 it is not clear that the evidence filed reflects Hydro's financial circumstances for 18 19 2014 and further that the evidence does not adequately address customer 20 impacts. Hydro has failed to provide a reasonable evidentiary basis consistent 21 with good utility practice to justify the proposed revenue transfer." 22 Please describe how the evidence filed in support of the Application addresses 23 customer impacts. 24 25 26 The current application sets out in detail the nature of the costs that were incurred Α.

during the January to March 2014 period to ensure that Hydro was in a position to

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be able to provide safe and adequate and just and reasonable service to its customers throughout this period. Hydro's application for the deferred recovery of the necessary capacity-related supply costs to serve customers is consistent with past Board treatment of other extraordinary non-capital expenses that were incurred outside a test year, and thus the recovery of these costs in consumer rates is appropriate. Specific consideration of "customer impacts" is not required by the Board in making determinations regarding the appropriateness of cost recovery for Major Extraordinary Repairs.

The foregoing being said, Hydro has proposed that the expenses be deferred for recovery over a five-year period beginning in 2015 to mitigate the implications of seeking to recover the full amount of \$9,965,000 from customers in one year.