Q. Reference: Application

If the Board were to authorize a fixed amount of capital expenditure(s) by Hydro in 2022 that is less than \$84,714,000 and if the Board were to do so without rejecting any particular proposed capital expenditure(s), would Hydro have the judgement, expertise and tools to determine what of its proposed 2022 capital expenditures can be accommodated within that fixed amount of capital expenditures considering both work priority and execution capability? Specifically, under this scenario how would Hydro make use of the project prioritization outlined in Table H-1, Appendix H?

Α.

Newfoundland and Labrador Hydro ("Hydro") has the judgement, expertise, and tools to determine which capital expenditures are necessary for 2022 and has reflected such in its 2022 Capital Budget Application ("CBA"). It is Hydro's view that a fixed amount of capital expenditure lower than the \$84.7 million proposed would result in risk to the provision of safe, reliable, least-cost service for customers as Hydro, through its CBA preparations, has already taken deliberate action (as outlined in Hydro's response to CA-NLH-016 of this proceeding) to reduce investment levels where practicable. The projects included in the 2022 CBA are those deemed necessary for the continued operation of a safe and reliable provincial electricity system. Furthermore, adopting a fixed capital expenditure amount would be an exercise of selecting an arbitrary cap on capital expenditures and would not reflect current regulatory practice. The prioritization matrix is one of a number of considerations used by Hydro to inform its total capital investment application; this tool uses a scoring system to evaluate the priority of projects based on prescribed categories. However, it is important to note that even the lowest ranking project is required, otherwise it would not have made it past Hydro's initial screening assessment.