Presuming Hydro will be filing a General Rate Application (GRA) in 2025, please indicate the 1 Q. 2 reason the proposed rate adjustment cannot be implemented as an interim rate following that 3 filing (i.e. rather than assume a delay until full GRA review occurs and is finalized). 4 5 A. On September 26, 2024, Newfoundland and Labrador Hydro ("Hydro") filed its Quarterly Update 6 7 - Items Impacting the Delay of Hydro's Next General Rate Application ("GRA")1 with the Board of Commissioners of Public Utilities ("Board"). With the details of the Government of 8 9 Newfoundland and Labrador's rate mitigation plan finalized, Hydro stated that it "continues to prepare to file its next GRA in the second half of 2025." 10 11 Hydro could file an application requesting the Board approve interim rates following the filing of the GRA in 2025; however, filing such an application will add more process to the GRA 12 13 proceeding, and delay the implementation of a revised wholesale rate that more accurately 14 reflects Hydro's marginal cost and provides benefits to customers. 15 The current application to revise the wholesale rate results in no customer rate impact on the proposed implementation date of January 1, 2025. The timing of implementation is intended to 16 coincide with the implementation of Newfoundland Power Inc.'s 2025–2026 GRA. This will allow 17 18 for the change in power purchase costs to be reflected in test year revenue requirements along 19 with updates to deferral account calculations, which will avoid an estimated 2.9% rate increase for residential customers on July 1, 2026. 20

¹ "Quarterly Update – Items Impacting the Delay of Hydro's Next General Rate Application," Newfoundland and Labrador Hydro filed September 26, 2024. http://www.pub.nl.ca/indexreports/nextgeneral/From%20NLH%20-%20Update%20-%202024-09-26.PDF