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- Q. Reference: "2022/2023 General Rate Application," Newfoundland Power, May 27, 2021, Volume 1, Page 1-5, Lines 8-10
 - a) Please provide the details of the increase in labour costs per year from 2019 to 2023.
 - b) Please provide the calculation of the labour inflation rate and provide the assumptions explaining the derivation.
 - c) Newfoundland Power's application states: "Operating labour costs are forecast to increase by approximately 2.1% annually from 2019 to 2023. This is approximately 1% less than the Company's annual labour inflation over the same period." Please provide the calculations that reflect this statement.
 - A. a) For details on changes in labour costs from 2019 to 2023 forecast, see the 2022/2023 General Rate Application, Volume 1, Application, Company Evidence and Exhibits, Section 2.4.1: Operating Costs.¹
 - b) For the calculation and details on Newfoundland Power's labour inflation rate, see the 2022/2023 General Rate Application, Volume 1, Application, Company Evidence and Exhibits, Section 2.4.1: Operating Costs, footnote 83 on page 2-38.
 - c) Table 1 provides the requested calculation.

Table 1:
Operating Labour Cost Compared to *Pro forma* Labour (Inflation Only)
2019A compared to 2023F
(\$000s)

	2019	2023F	Change	Change (%)
Operating Labour ²	35,241	38,136	2,895	2.05^{3}
Pro forma Operating Labour	35,241	$39,479^4$	4,238	3.01^{5}
Difference	-	(1,343)	(1,343)	(0.96)

The discussion on labour costs begins on page 2-37.

See the 2022/2023 General Rate Application, Volume 1, Application, Company Evidence and Exhibits, Section 2: Customer Operations, page 2-37, Table 2-11.

 $^{2,895 / 35,241 / 4 \}text{ years} = 0.0205$, or approximately 2.1%.

Pro forma 2023 operating labour is calculated by applying Newfoundland Power's annual inflation rate to the Company's 2019 operating labour [\$35,241 * 1.0292 * 1.0275 * 1.0300 * 1.0285 = \$39,479]. See the 2022/2023 General Rate Application, Volume 1, Application, Company Evidence and Exhibits, Section 2: Customer Operations, page 2-38, footnote 83.

 $^{^{5}}$ \$4,238 / \$35,241 / 4 years = 0.0301.