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Q. Reference: "2022/2023 General Rate Application," Newfoundland Power, May 27, 2021, Volume 2, Report 6, Section 2.3, Page 4 of 13, Footnote 14.

Please indicate if any of the utilities that responded "N/A" had responded that they have no general overhead capitalization. If so, please confirm that the 10% calculated excludes utilities that do not have general overhead capitalization.

A. It is confirmed that the 10% average capitalization rate of surveyed utilities excludes the utilities that indicated that they do not capitalize overheads as a component of construction costs.<sup>1</sup>

Utility 6 and Utility 9 both responded "N/A" to Question 7 when asked to provide an overhead capitalization rate. In their respective responses to Question 5.a, both utilities also indicated they do not capitalize overheads as a component of construction costs. See the 2022/2023 General Rate Application, Volume 2, Supporting Materials, Tab 6, Review of General Expenses Capitalized, Attachment 1, Appendix E, page E-3.

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