

- 1 **Q. (Reference Application, 2024 Capital Budget Overview, Table 3, page 12)**
 2 **a) Please reproduce Table 3 showing each Atlantic utility separately.**
 3 **b) Please reframe Table 3 by showing capital expenditures for the given years**
 4 **on a per-customer basis. (If customer numbers are not available then use**
 5 **provincial populations for the Maritimes and population in NP's service area**
 6 **for NP as proxies.)**

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 8 A. a) The reliability data used by Newfoundland Power related to other utilities is obtained
 9 from databases maintained by Electricity Canada. Under Electricity Canada's
 10 confidentiality rules, data supplied to it by member utilities can only be produced in
 11 aggregate. Newfoundland Power is unable to provide reliability data pertaining to
 12 individual Atlantic Canadian utilities.

13
 14 The capital investment data provided for the Atlantic Canadian utilities in the *2024*
 15 *Capital Budget Overview*, page 12, Table 3 reflects the average Property, Plant and
 16 Equipment ("PP&E") in Transmission and Distribution ("T&D") assets of Nova Scotia
 17 Power, NB Power and Maritime Electric. This information is based on the financial
 18 statements of Nova Scotia Power, NB Power and Maritime Electric. As Maritime
 19 Electric's financial statements are not publicly available, the Atlantic Canadian data
 20 can only be presented in the aggregate.

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 22 b) Table 1 provides requested information that compares Newfoundland Power to the
 23 average of the other Atlantic Canadian utilities on the basis of capital investment per
 24 customer.

Table 1 Atlantic Canadian Comparison Capital Investment						
Utility	Capital Investment (\$Millions) ¹		Customers (000s)		Capital Investment per Customer (\$)	
	2012	2021	2012	2021	2012	2021
Newfoundland Power	1,024	1,536	252	272	4,071	5,646
Atlantic Canadian Utilities ²	1,193	1,738	323	347	3,693	5,009

¹ Reflects the gross value of PP&E in T&D assets determined in accordance with generally accepted accounting principles.

² Reflects average investment and average customers of Nova Scotia Power, NB Power and Maritime Electric.