Q. Reference: 2024 Return on Rate Base

Why did Newfoundland Power not request an extension for filing this application, which presumes the Board will approve the entirety of its 2023 (sic) Capital Budget Application, in light of the fact at the time of filing the Board had not yet issued an order regarding that Capital Budget Application?

A. Newfoundland Power endeavours to meet all timelines established by the Board. While it may not always have visibility into the Board's reasoning, the Company expects that each timeline is determined with full consideration of the regulatory cycle.

In Order No. P.U. 3 (2022) (the "2022/2023 GRA Order"), the Board set November 15, 2023 as the deadline for filing the Company's 2024 Rate of Return on Rate Base Application.¹ At the time of writing the 2022/2023 GRA Order, it is unlikely that the Board expected an order on the Company's 2024 Capital Budget Application to have been issued by that date. In recent years, orders on the Company's capital budget applications have not been issued until mid-December at the earliest.² This suggests that the Board was prepared to consider the Company's 2024 Rate of Return on Rate Base Application prior to issuing an order on the Company's 2024 Capital Budget Application.³

¹ See Order No. P.U. 3 (2022), page 20, lines 17-20.

See, for example, the three most recent capital budget applications at the time of the Board's issuing the 2022/2023 GRA Order: (i) Order No. P.U. 36 (2021) in relation to the Company's 2022 Capital Budget Application, dated December 20, 2021; (ii) Orders No. P.U. 37 (2020) and P.U. 10 (2021) in relation to the Company's 2021 Capital Budget Application, dated December 15, 2020 and March 26, 2021, respectively; and (iii) Order No. P.U. 5 (2020) in relation to the Company's 2020 Capital Budget Application, dated February 21, 2020.

This is consistent with the Board's practice in 2020 when it issued an order on the Company's 2021 rate of return on rate base prior to approving the capital budget for the same year. See Order No. P.U. 36 (2020) on the Company's 2021 Rate of Return on Rate Base Application dated December 14, 2020 and Order No. P.U. 37 (2020) on the Company's 2021 Capital Budget Application dated December 15, 2020.