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- Q. (Reference Application, Use of Historical Averages for Budget Estimation, page 3) It is stated that the average of adjusted historical cost "is inflated by the GDP Deflator for Canada for non-labour costs and the Company's internal labour inflation rate for labour costs."
 - a) Does NP apply its internal labour inflation to contract labour as well as its in-house labour? If so, what is the rationale?
 - b) Please provide a table giving NP's internal labour inflation rate and the GDP inflation rate for the years 2020 to 2024 inclusive.
 - a) No, Newfoundland Power only uses its internal weighted-labour inflation rate to calculate inflationary increases associated with its internal labour costs.
 - b) Table 1 provides Newfoundland Power's inflation rates for 2020 to 2024 forecast.

Table 1 Inflation Rates 2020 to 2024 Forecast (%)		
Year	Labour ¹	Non-Labour ²
2020	2.92%	1.03%
2021	2.75%	7.68%
2022	3.00%	7.67%
2023	2.85%	1.34%
2024F	3.80%	2.27%

Labour inflation rates are based on the Company's internal weighted-labour inflation rate which reflects base compensation increases as well as progression.

In Order No. P.U. 36 (1998-1999), the Board ordered the adoption of the GDP Deflator for Canada as an appropriate inflation index for forecasting Newfoundland Power's non-labour expenses. The GDP index was provided in the Conference Board of Canada's data release in February 2024.