

- 1 **Q. (Reference CA-NP-118)**
2 **a) Does Newfoundland Power have the information requested in CA-NP-118? If**
3 **not, why not? If so, why is it not being provided?**
4 **b) Would the provision of this information alter or otherwise taint or cause delays**
5 **in the ongoing Rate Design Review or Load Research Study?**
6 **c) Has Newfoundland Power made this information available to the consultant**
7 **conducting the Rate Design Review?**
8 **d) Please confirm that Newfoundland Power is proposing changes to its rates in**
9 **this GRA.**
10 **e) Does the absence of proposals to change its rate designs in this GRA mean that**
11 **in Newfoundland Power’s opinion intervenors and the Board are not allowed to**
12 **consider or otherwise propose changes to proposed rates?**
13 **f) Are the parties and the Board allowed to review aspects in the GRA that relate**
14 **only to specific proposals in the GRA?**
15 **g) Does the Board have the authority to direct Newfoundland Power to alter,**
16 **modify or implement a completely new rate design even if Newfoundland Power**
17 **has not proposed any changes to its rate designs in this GRA and even though**
18 **Newfoundland Power is conducting a rate design review? Can Newfoundland**
19 **Power cite an occasion when the Board has done so?**
20 **h) Does the Board have the authority to direct Newfoundland Power to alter,**
21 **modify or implement a completely new cost of service study even if**
22 **Newfoundland Power has not proposed any changes to its cost of service study**
23 **in this GRA, and even though Newfoundland Power is conducting a rate design**
24 **review? Can Newfoundland Power cite an occasion when the Board has done**
25 **so?**
26
27 **A. a) Request for Information CA-NP-118 contemplates a hypothetical scenario that**
28 **Newfoundland Power has not evaluated for the reasons outlined in that response.**
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30 The Company observes that Request for Information CA-NP-289 requests a specific
31 scenario that is similar in nature to that requested in the Request for Information
32 CA-NP-118. See Attachment A to Newfoundland Power’s response to Request for
33 Information CA-NP-289 for further information.
34
35 **b) No. See part a).**
36
37 **c) No. See part a).**
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39 **d) It is confirmed.**
40
41 **e) No, the absence of proposals to change the Company’s rate designs in this GRA does**
42 **not preclude the Board and intervenors from considering changes to proposed rates.**
43 **Newfoundland Power submits that while changes to customer rates may be proposed**
44 **or considered by the Board or intervenors, in the absence of evidence suggesting that**
45 **the Company’s current rate design is unreasonable, it would be unusual for the Board**
46 **to order changes to the rate design.**

- 1 f) Yes, the purpose of the information request process is to provide the parties with an
2 opportunity to gain a satisfactory understanding of the matters to be considered by the
3 Board in the Application.
4
- 5 g) The Board has the ability to direct the Company to adjust its rate design or cost
6 allocations. Newfoundland Power is not aware of a situation where the Board
7 changed the Company's rate design or cost allocations in the absence of a
8 Newfoundland Power proposal.¹
9
- 10 h) See part g).

¹ As examples of rate designs and cost allocations approved by the Board in the last decade: In Order No. P.U. 13 (2013), the Board approved changes to Newfoundland Power's rate design and structure proposed by the Company in its 2013/2014 GRA. The changes in rate design at that time were based, in part, by the retail rate design review that was filed with the Board in 2009. In Order No. P.U. 2 (2019), the Board approved changes to Rate 2.1 General Service basic customer charges based on shifts in cost allocations, as well as the introduction of a LED street and area lighting rate offering, both as proposed by the Company in its 2019/2020 GRA.