1       0.001 am.)       2       CHAIR:         3       Q.       Good morning everyone. Any preliminary matters, Ms. Glym?       3       A.       Yes, that's correct.         4       Good morning everyone. Any preliminary matters, Ms. Glym?       4       Q.       And when I looked at what the targets were of and lassume the target is the plan, is that correct?         6       Q.       I do believe that the Consumer Advocate       6       and when I looked at what the targets were can those in the process, we need those ASAP because what the process, we need those ASAP because what the process, we need those ASAP because what in 2021, 25, 2022, 25, 55 and 2023, 2, 69. So there is a slight deterioration in the target as in 15         11       process, we need those ASAP because what in 12021, 2, 25, 2022, 2, 55, 30 there is a slight deterioration in the target as in 15         12       think there will be further discussions       15         13       later today, so we're working on coming up the whigh the finished       14         14       yeas we lead so as we're working on coming up the hearing actually ends as well, so 1 think       18         15       MS. GLYNN:       10         16       hearing date will end, getting that public       20         17       we're all hoging that we might be finished       20         18       thearing actually ends as well, so 1 think       20       NG. CHUBBS:		Page 1		Page 3
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Page 5       Page 7         1       external conditions.       2         2       GREENE, KC:       3       Q. But you do agree that target is getting       4         4       lower to achieve.       3       Q. And again we see that each year your target         5       MR. CHUBBS:       5       GREENE, KC:         9       Q. Yes, and that is what is a measure for one       6       MR. CHUBBS:         1       which is influencing your short-term       1       Newfoundland Power to continue at the same         12       meentive payments, is that correct?       3       A. Yes, that's correct.         13       MR. CHUBBS:       1       A. Yes, that's correct.         14       A. Yes, that's correct.       GREENE, KC:       9         15       GREENE, KC:       1       A. So as I mentioned in terms of our         16       Q. Can you explain why it is the same in 2024       1       A. So as I mentioned in terms of our         17       as in 2023?       IA       A so as I mentioned in terms of our         18       MR. CHUBBS:       1       A. So as I mentioned in terms of our         19       A. That would just be a matter of the       1       Battarget revelops to a sour response to achieve three key things in our         19 </th <th>1external conditions.1A.Yes, that's correct.2GREENE, KC:3Q.But you do agree that target is getting3Q.And again we see that each yee4lower to achieve.3Q.And again we see that each yee4for the subsequent year increase5MR. CHUBBS:5you didn't meet your target the6A.The five-year average has increased in the6MR. CHUBBS:77last few years, yes.7A.Yes, that's correct.8GREENE, KC:8GREENE, KC:99Q.Yes, and that is what is a measure for one9Q.So the question is what is the is10of the metrics in your corporate performance10Newfoundland Power to conti11which is influencing your short-term11level of reliability or control o12incentive payments, is that correct?12costs if your incentive paymer13MR. CHUBBS:13lower achievement in previous14A.Yes, that's correct.14MR. CHUBBS:15GREENE, KC:15A.So as I mentioned in terms of16Q.Can you explain why it is the same in 202416reliability, you know, we use t18MR. CHUBBS:18that target, there's really, it is19A.That would just be a matter of the19term incentive, it is based on y20calculation, the average for the last five20performance for th</th> <th>rage /</th>	1external conditions.1A.Yes, that's correct.2GREENE, KC:3Q.But you do agree that target is getting3Q.And again we see that each yee4lower to achieve.3Q.And again we see that each yee4for the subsequent year increase5MR. CHUBBS:5you didn't meet your target the6A.The five-year average has increased in the6MR. CHUBBS:77last few years, yes.7A.Yes, that's correct.8GREENE, KC:8GREENE, KC:99Q.Yes, and that is what is a measure for one9Q.So the question is what is the is10of the metrics in your corporate performance10Newfoundland Power to conti11which is influencing your short-term11level of reliability or control o12incentive payments, is that correct?12costs if your incentive paymer13MR. CHUBBS:13lower achievement in previous14A.Yes, that's correct.14MR. CHUBBS:15GREENE, KC:15A.So as I mentioned in terms of16Q.Can you explain why it is the same in 202416reliability, you know, we use t18MR. CHUBBS:18that target, there's really, it is19A.That would just be a matter of the19term incentive, it is based on y20calculation, the average for the last five20performance for th	rage /
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22 down in the first period you showed on the 22 band keeps that incentive there to still		you can
		•
		t, but the
24 is that correct? 24 still continue to minimize planned outages		t, but the e to still
	25 MR. CHUBBS: 25 where you can for customers, a	t, but the e to still nce work done,

	Page 9		Page 11
1	as effective and efficient and quick in your	1	outcomes.
2	response to customer outages and storms and		GREENE, KC:
3	things when they occur. So I think the	3	Q. You mentioned extreme weather as one of your
4	incentive works well over the course of a	4	challenges and one of the challenges in
5	year in incenting reliability performance.	5	operations, as well as in control of your
6	Operating costs, you know, what's going on	6	costs. Is Newfoundland Power adjusting its
7	there in operating costs is really a	7	operations to take into account more extreme
8	reflection of what we've been seeing over	8	weather events?
9	the last few years in terms of inflation, so	9	MR. CHUBBS:
10	it comes back to our, again, back to my	10	A. Yes, we are.
11	original opening statement. When you look	11	GREENE, KC:
12	back at, say 2020, for example, and we're	12	Q. PUB NP-056, that's what I think you're
13	forecasting where operating costs are going	13	looking for.
14	to go, we're using GDP, you know, for	14	MR. CHUBBS:
15	inflation and what we forecast at that time	15	A. You know where I'm going?
16	was not what we experienced. So we're	16	GREENE, KC:
17	forecasting, you know, GDP of two or three	17	Q. I think so.
18	percent a year and then through the years,	18	MR. CHUBBS:
19	'21, '22 or '23, we're seeing more like 7, 8	19	A. You were right.
20	percent, right? So that's the result of	20	GREENE, KC:
21	costs that are largely outside of	21	Q. It's just you've mentioned it as one of the
22	Newfoundland Power's control, things that	22	challenges for your costs and for your
23	happen in the market in terms of insurance	23	reliability and the obvious question is how
24	and technology costs and things like that.	24	are you preparing to respond to it for the
25	So they've made that target very challenging	25	future so we don't see it continue a decline
	Page 10		Page 12
1	Page 10 over the last couple of years, and as a	1	Page 12 in trend?
$\begin{vmatrix} 1\\ 2 \end{vmatrix}$	over the last couple of years, and as a	1 2	in trend?
2	over the last couple of years, and as a result, we haven't met that target and the	2	-
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1		1	incompany 1
1	standard fully, you just start building to	1	improved our operational response when it
2	that standard going forward, so when I look	2	comes to major storms and events, so our new
3	at over the last 20 years, I'd say about 30	3	outage management system that we implemented
4	percent of our system has been rebuilt to	4	in 2019 has predicted systems I was talking
5	that standard and that has helped us	5	about yesterday, has really been a game
6	withstand some extreme weather conditions.	6	changer for Newfoundland Power in terms of
7	You know, our capital program is the other	7	understanding the conditions on the system
8	big component of it, right, and preventative	8	when we have major outages. Our GIS system,
9	maintenance and corrective maintenance	9	so everything is mapped, all of our crew
10	projects and programs in our capital budget.	10	location, our trucks have vehicle tracking
11	We've incorporated other things, like flood	11	so we can get the nearest truck to the
12	zones, coastal erosion risk areas into our	12	outage as quick as we can to improve that
13	line designs, so as our engineers and	13	response. Our workforce management system
14	technologists are designing lines,	14	so we can electronically dispatch work to
15	transmission lines distribution lines,	15	laptops in the trucks, rather than trying to
16	they're taking these things into account so	16	get paper work orders out like we used to in
17	that 50 or 100 year flood zone doesn't get	17	the past. And then the system automation
18	major flooding, you're minimizing the impact	18	that we put in place, so we have a lot of
19	on your lines. Coastal erosion, we saw that	19	remote control capabilities in our
20	very real with Hurricane Fiona on the west	20	substations and on our distribution lines
21	coast in Port aux Basques, right. I think we	21	that minimize the impact of the outage and
22	saw the impacts of potential for coastal	22	allow our crews to focus on restoring power
23	erosion on our infrastructure. And the	23	so they're not searching for where the
24	other piece of it is resiliency and that is	24	trouble is on the system.
25	probably the larger focus of utilities when	25	GREENE, KC:
	Page 14		Page 16
1	it comes to climate adaptation, and that's	1	Q. A number of the initiatives you outlined
2	the ability to bounce back, right, so	2	were designed specifically to respond to
$\frac{2}{3}$	everyone is getting hit with storms and	$\frac{2}{3}$	climate change, were they? They were
4	everyone is baving these outages, how well	4	general operating practices of Newfoundland
5	does your system and your response get power	5	Power?
6	back to customers, how quickly? And we've	6	MR. CHUBBS:
0 7	done a lot of work in that area. We have a	7	A. They certainly support –
8		8	
	lot of, you know, upfront checklists		GREENE, KC:
9	preparing for storms, we have, we run	9	Q. They could support –
10	through tabletop exercises, we do—we have	10	MR. CHUBBS:
11	organizational charts that are separate for	11	A the response, absolutely and they've been
12	storms, right, and responsibilities that we	12	very effective for Newfoundland Power over
13	put into place if we get into a major storm.	13	the last few years as we've been dealing
14		1/1	with, you know, some significant events like
15	Customer communications plans in place for	14	
1.6	these major events, you know, strong	15	Snowmageddon or Hurricane Larry or Fiona,
16	these major events, you know, strong relationships with Newfoundland and Labrador	15 16	Snowmageddon or Hurricane Larry or Fiona, they've absolutely been impactful for us.
17	these major events, you know, strong relationships with Newfoundland and Labrador Hydro, Emergency Management, EMS in the	15 16 17	Snowmageddon or Hurricane Larry or Fiona, they've absolutely been impactful for us. GREENE, KC:
17 18	these major events, you know, strong relationships with Newfoundland and Labrador Hydro, Emergency Management, EMS in the province on municipalities, as well. We	15 16 17 18	Snowmageddon or Hurricane Larry or Fiona, they've absolutely been impactful for us. GREENE, KC: Q. Some of the other utilities, such as
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17 18 19 20 21 22 23	these major events, you know, strong relationships with Newfoundland and Labrador Hydro, Emergency Management, EMS in the province on municipalities, as well. We have mutual assistance agreements in place with other utilities so we can bring resources in, if necessary, and vice versa if we need to send resources elsewhere. And technology has been a big piece of that for	15 16 17 18 19 20 21 22 23	Snowmageddon or Hurricane Larry or Fiona, they've absolutely been impactful for us. GREENE, KC: Q. Some of the other utilities, such as Maritime Electric have developed a specific strategy for dealing with climate change adoption, has Newfoundland Power considered developing a similar strategy? MR. CHUBBS:
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1	assessments on our infrastructure, so we've	1	MR. CHUBBS:
$\begin{vmatrix} 1\\2 \end{vmatrix}$	looked across how other utilities and	1 $2$	A. Yeah, yeah.
$\begin{vmatrix} 2\\3 \end{vmatrix}$		$\begin{bmatrix} 2\\ 3 \end{bmatrix}$	GREENE, KC:
	organizations are approaching it and you really want to understand the risk of	4	
4	•		Q. Another topic like that, before we move on
5	climate change and how it can affect your	5	to operating costs, is electrification and
6	utility and your operations. For	6	again you mentioned it earlier as one of the
7	Newfoundland, you know, wind and ice loading		challenges that is facing all utilities,
8	clearly is a risk for our operations in	8	what the impact of the grid will be of
9	terms of reliability. Coastal erosion, as I	9	increasing customer demand because of the
10	mentioned, which I would say early on was	10	switch to electrification. Again, how is
11	probably on the lower end, you know, we live	11	Newfoundland Power planning to address the
12	on a rock, right, so you don't expect	12	impact of electrification growth on your
13	coastal erosion to be as impactful here as	13	system?
14	it would be, say in PEI, but we saw the	14	MR. CHUBBS:
15	impacts of that in Fiona on the Westcoast.	15	A. So we've got a number of initiatives
16	But we've done that risk assessment and are	16	happening around electrification at
17	putting in place action items to address	17	Newfoundland Power. In terms of our capital
18	that. I mentioned flooding, for example, so	18	program, and I know this was a question for
19	we've incorporated flood zones into our line	19	Mr. Murray on how we had incorporated
20	designs. We've added layers, so we know	20	electrification into our capital planning,
21	take data from the provincial government for	21	so that happens in a few, in a couple of
22	wildfires, right, so everyone, you know,	22	ways. You know, electrification is built
23	we've all been watching what's happening in	23	into our load forecast, so home heating
24	Churchill Falls the last few days. We've	24	conversions, electric vehicle adoption, that
25	added this to our Geographical Information	25	forms part of our customer load forecast and
	Page 18		Page 20
1	System, our GIS system, so that if a	1	that gets incorporated into our capital
2	wildfire were to occur in our territory, we	2	planning every year as part of our
$\begin{vmatrix} 2\\ 3 \end{vmatrix}$	can look at that layer and understand what	3	substation power transformer and
4	infrastructure we have near it and be able	4	distribution feeder load forecast, so we
5	to respond.	5	take the forecast growth and we allocate
6	GREENE, KC:	6	that across the electricity system in areas
	Q. You've talked about a number of different	7	where we know growth is occurring, you know,
8	initiatives, do you plan to bring together	8	more, so we weight it, in some areas versus
9	in one overall strategy where customers can	9	others based on known growth areas, and that
10	see how prepared Newfoundland Power is to	10	highlights if any of our lines are reaching
11	respond to these types of events?	11	capacity and if our power transformers are
11	MR. CHUBBS:	12	starting to reach capacity and whether we
12	A. I think that's something that is worth	12	need to do upgrades there to address that.
13	considering, you know, how we present that	13	So when I look at our capital budget, we've
14	•••	14	
	to customers. I know we have a lot in place		got two projects in the latter years of our
16	internally and we do communicate with our	16	five-year plan, one in Kelligrews and one in
17	customers when we have severe weather and	17	Hardwoods substation to add power
18	system events to help customers understand	18	transformer capacity there. It's not
19	what we're doing, but I can't say that we've	19	directly related to electrification or
20	put anything out there that kind of outlines	20	electrical vehicles, it's related to general
21	the strategy and what we're doing as an	21	load growth, but electric vehicle growth is
22	upfront –	22	in amongst that, so it's part of it, and
23	GREENE, KC:	23	we've got about 11 million dollars
24	Q. Similar to what, for example, Maritime	24	identified in specific distribution upgrades
25	Electric has done recently.	25	over the next five years in areas where we

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1	Page 21	1	Page 23
	see the system is starting to reach	1	because maybe they're maxed out, and then
$\begin{vmatrix} 2\\ 2 \end{vmatrix}$	capacity. One of the different things about	2	there's other times where it might not
3	electrification, for us, is it's a different	3	affect, you know, four customers on the same
4	type of growth for Newfoundland Power. It's	4	transformer, but once you put that
5	a type of growth we haven't really	5	altogether, the transformer needs an
6	experienced to this degree, so when I think	6	upgrade, you know. So the average that we
7	historically of load growth at Newfoundland	7	estimate was around 500, so what we do is we
8	Power, it's been about new customer	8	take the electric vehicle forecast, the
9	connections, you now, new subdivisions, new	9	latest information we have on EVs, and we
10	homes. We know exactly when the customer is	10	essentially multiply that by \$500.00, you
11	building the house, they're contacting us	11	know, based on the given year and we built
12	and we know the cost to run a line to that	12	that in as a separate line in our capital
13	house, install a meter and that's normal	13	plan to address electrification growth
14	routine operation at Newfoundland Power.	14	across our service territory.
15	What we're seeing with electrification is	15	GREENE, KC:
16	this is additional growth in existing areas,	16	Q. And what about oil to electricity
17	so we think of a home or a neighbourhood	17	conversion, how are you tracking that and
18	that's been built for 40 years, you know,	18	reflecting that in your plans?
19	and the infrastructure has been there for 40	19	MR. CHUBBS:
20	years and the capacity has been sufficient	20	A. So that would be similar to what I mentioned
21	for 40 years and then, you know, an electric	21	upfront, like that's built into our load
22	vehicle is purchased by a home and then up	22	forecast. You know, it's not to the same
23	the street another electric vehicle and	23	degree as electric vehicles will potentially
24	eventually you get to a point where, okay,	24	be, right, so it's not causing any other
25	now the power transformer is at capacity or	25	issues or concerns for us, other than
	Page 22		Page 24
1	maybe that customer needs a service upgrade	1	general growth that we can address through
2	or eventually the main line feeding into the	2	our normal planning processes, and you know,
3	area would need an upgrade, in areas that	3	I think the plan right now, for the
4	are already existing, and the challenge with	4	provincial government plan is 10,000 of
5	that, one challenge with that is, you know,	5	these conversions; whereas, when we look at
6	customers aren't telling us they're buying	6	EVs, you know, there's 400,000 vehicles on
7	electric vehicles, right, so we have to do a	7	the road in Newfoundland and Labrador, so
8	different type of analysis on the system to	8	that's a much larger scale, so the adoption
9	understand where that growth is occurring so	9	rate is not to the point yet where it's of
10	we can deal with it before it causes any	10	major concern for us, but we're trying to do
11	issues on our system. So we've started to	11	the things now and plan now for when that
12	do that, review it every year, we're looking	12	time comes. And I have a longer list, but
13	at our system now and looking at	13	I'll stop there.
14	distribution transformers and our	14	GREENE, KC:
15		1.7	,
1.1.	distribution lines and trying to understand	15	Q. So as I understand your answer and as
16	areas where we're seeing new pockets of new	16	Q. So as I understand your answer and as reflected in PUB-NP-052, which we don't need
17	areas where we're seeing new pockets of new types of growth and getting out ahead of	16 17	Q. So as I understand your answer and as reflected in PUB-NP-052, which we don't need to go through, you do have in your five-year
17 18	areas where we're seeing new pockets of new types of growth and getting out ahead of that. We done a calculation, we estimate	16 17 18	Q. So as I understand your answer and as reflected in PUB-NP-052, which we don't need to go through, you do have in your five-year plan some load growth additions, like
17 18 19	areas where we're seeing new pockets of new types of growth and getting out ahead of that. We done a calculation, we estimate that it's about \$500.00 per EV in	16 17 18 19	Q. So as I understand your answer and as reflected in PUB-NP-052, which we don't need to go through, you do have in your five-year plan some load growth additions, like additional transformers, whether it's for
17 18 19 20	areas where we're seeing new pockets of new types of growth and getting out ahead of that. We done a calculation, we estimate that it's about \$500.00 per EV in distribution upgrades at the service level	16 17 18 19 20	Q. So as I understand your answer and as reflected in PUB-NP-052, which we don't need to go through, you do have in your five-year plan some load growth additions, like additional transformers, whether it's for electrification or for any other reason for
17 18 19 20 21	areas where we're seeing new pockets of new types of growth and getting out ahead of that. We done a calculation, we estimate that it's about \$500.00 per EV in distribution upgrades at the service level for customers. Now every, you know, there's	16 17 18 19 20 21	Q. So as I understand your answer and as reflected in PUB-NP-052, which we don't need to go through, you do have in your five-year plan some load growth additions, like additional transformers, whether it's for electrification or for any other reason for load growth, such as immigration which we've
17 18 19 20 21 22	areas where we're seeing new pockets of new types of growth and getting out ahead of that. We done a calculation, we estimate that it's about \$500.00 per EV in distribution upgrades at the service level for customers. Now every, you know, there's many EVs now, a customer buys it, you know,	16 17 18 19 20 21 22	Q. So as I understand your answer and as reflected in PUB-NP-052, which we don't need to go through, you do have in your five-year plan some load growth additions, like additional transformers, whether it's for electrification or for any other reason for load growth, such as immigration which we've heard recently is increasing, is that
17 18 19 20 21 22 23	areas where we're seeing new pockets of new types of growth and getting out ahead of that. We done a calculation, we estimate that it's about \$500.00 per EV in distribution upgrades at the service level for customers. Now every, you know, there's many EVs now, a customer buys it, you know, they might put in a charger, but it doesn't	16 17 18 19 20 21 22 23	Q. So as I understand your answer and as reflected in PUB-NP-052, which we don't need to go through, you do have in your five-year plan some load growth additions, like additional transformers, whether it's for electrification or for any other reason for load growth, such as immigration which we've heard recently is increasing, is that correct?
17 18 19 20 21 22	areas where we're seeing new pockets of new types of growth and getting out ahead of that. We done a calculation, we estimate that it's about \$500.00 per EV in distribution upgrades at the service level for customers. Now every, you know, there's many EVs now, a customer buys it, you know,	16 17 18 19 20 21 22	Q. So as I understand your answer and as reflected in PUB-NP-052, which we don't need to go through, you do have in your five-year plan some load growth additions, like additional transformers, whether it's for electrification or for any other reason for load growth, such as immigration which we've heard recently is increasing, is that

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1	Page 25	1	Page 27
1	GREENE, KC:		our health and safety program or
2	Q. And we also understand from PUB-NP-053 that	2	environmental management system, which are
3	beyond the five-year plan and planning for	3	also based on ISO standards in that on a
4	load growth for electrification and other	4	regular basis you are reviewing your, you
5	purposes, Newfoundland Power is not	5	know, KPI is your key data, your key risks
6	specifically addressing how electrification	6	and you're making adjustments routinely, you
7	will affect its operations, is that correct?	7	know, so for health and safety at
8	(9:30 a.m.)	8	Newfoundland Power, we have an annual review
9	MR. CHUBBS:	9	with the full executive and management team
10	A. Yes, that's generally correct. I would say	10	every year where our health and safety team
11	that things that we're doing right now are	11	take us through, you know, what we're seeing
12	preparing us for what's coming beyond the	12	in terms of, you know, soft-tissue injuries
13	five-year plan, and I'll point out that, you	13	or slips and falls or switching incidents,
14	know, our five-year plan is a rolling five	14	or whatever that may be, we look at where
15	years, so we updated that every year, so	15	the trends are going and we develop a new
16	we've always got that five-year outlook.	16	action plan to address that and that, you
17	GREENE, KC:	17	know, that delivers on that continual
17		18	
			improvement and we've seen improvement year
19	the asset management review. Here I would	19	over year in terms of employee injuries as a
20	like to go to PUB-NP-050. And here you had	20	result of that, and that's how I see asset
21	given us an update on where Newfoundland	21	management going. I see once we get, you
22	Power was with the ongoing asset management	22	know, the key documentation in place, it
23	review. Is there any change to this status	23	will be a routine, okay, let's sit down,
24	since this RFI was filed?	24	look at the system, look at what's happening
25	MR. CHUBBS:	25	in terms of causes of outages or what we're
	Page 26		Page 28
1	A. No, I don't believe so.	1	finding on our inspections or the age of our
2	GREENE, KC:	2	infrastructure, whatever all that may be,
3	Q. And you indicated earlier, yesterday, that	3	costs as well, where are the trends going,
4	you see this as an ongoing process with a	4	and then you will sit back as a team and say
5			and then you will sit back as a team and say
	length implementation period, in fact, I	5	•
6	length implementation period, in fact, I think the answer says up to 7 years, is that	5	what do we need to focus on over the next 12
6 7	think the answer says up to 7 years, is that	5 6	what do we need to focus on over the next 12 months to make improvements, right, so it
7	think the answer says up to 7 years, is that correct?	5 6 7	what do we need to focus on over the next 12 months to make improvements, right, so it will be an annual process.
7 8	think the answer says up to 7 years, is that correct? MR. CHUBBS:	5 6 7 8	what do we need to focus on over the next 12 months to make improvements, right, so it will be an annual process. GREENE, KC:
7 8 9	<ul><li>think the answer says up to 7 years, is that correct?</li><li>MR. CHUBBS:</li><li>A. You know, I think 7 years was an example</li></ul>	5 6 7 8 9	<ul><li>what do we need to focus on over the next 12 months to make improvements, right, so it will be an annual process.</li><li>GREENE, KC:</li><li>Q. In the response we see in No. 2 a Target</li></ul>
7 8 9 10	<ul><li>think the answer says up to 7 years, is that correct?</li><li>MR. CHUBBS:</li><li>A. You know, I think 7 years was an example that I provided and as I mentioned</li></ul>	5 6 7 8 9 10	<ul><li>what do we need to focus on over the next 12 months to make improvements, right, so it will be an annual process.</li><li>GREENE, KC:</li><li>Q. In the response we see in No. 2 a Target State Assessment which is the phase that's</li></ul>
7 8 9 10 11	<ul><li>think the answer says up to 7 years, is that correct?</li><li>MR. CHUBBS:</li><li>A. You know, I think 7 years was an example that I provided and as I mentioned yesterday, I don't really see an endpoint</li></ul>	5 6 7 8 9 10 11	<ul> <li>what do we need to focus on over the next 12 months to make improvements, right, so it will be an annual process.</li> <li>GREENE, KC:</li> <li>Q. In the response we see in No. 2 a Target State Assessment which is the phase that's currently ongoing, is that correct?</li> </ul>
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7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	<ul> <li>think the answer says up to 7 years, is that correct?</li> <li>MR. CHUBBS:</li> <li>A. You know, I think 7 years was an example that I provided and as I mentioned yesterday, I don't really see an endpoint for this and I think as we've educated ourselves on this ISO 55000 asset management standard, it's not really a set of asset management practices, it's more of an approach or methodology to asset management, like it starts at the highest level of an asset management strategy and then a development of strategy, specific strategies for assets across the organization. Like any ISO standard, you know, it's big on documentation, that you have your</li> </ul>	5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	<ul> <li>what do we need to focus on over the next 12 months to make improvements, right, so it will be an annual process.</li> <li>GREENE, KC:</li> <li>Q. In the response we see in No. 2 a Target State Assessment which is the phase that's currently ongoing, is that correct?</li> <li>MR. CHUBBS:</li> <li>A. No, I believe the response says that the target state is completed and we're into implementation planning now.</li> <li>GREENE, KC:</li> <li>Q. If you go down –</li> <li>MR. CHUBBS:</li> <li>A. I could be mistaken.</li> <li>GREENE, KC:</li> <li>Q. The target state, line 30, "If a Target State Assessment phase is currently</li> </ul>

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1	Page 29		Page 31
1	MR. CHUBBS:	1	know, we talk about the shift in our focus
2	A. Okay, yeah, sorry, I was mistaken, yes.	2	on reliability and reliability improvements
3	GREENE, KC:	3	in early 2000s, and that was when we first
4	Q that's not important.	4	implemented our current asset management
5	MR. CHUBBS:	5	technology and processes around preventative
6	A. That's right.	6	maintenance and inspections following that,
7	GREENE, KC:	7	I guess, goal, that we set. I'm not aware
8	Q. I assume the Target State Assessment looks	8	that there was any specific consultations
9	at where you should be as opposed to where	9	that happened over that time. It was just
10	you are now, is that correct?	10	the direction of management, we felt as a
11	MR. CHUBBS:	11	company we needed to move. I also think
12	A. Yes, that's correct.	12	about, you know, the last decade or so and
13	GREENE, KC:	13	probably, you know, maybe we can use DarkNL
14	Q. So I would also take from that that there	14	as a trigger point there, but we've
15	could be some, I'll call them significant	15	integrated a lot of significant technologies
16	changes in how you could approach the	16	into our operations to help us respond
17	collection of data, your operational	17	better for major events and outages. That
18	procedures, your maintenance practices, is	18	was a significant change in our operations
19	that correct?	19	as well, and all of those changes typically
20	MR. CHUBBS:	20	came forward through our capital budget
21	A. There could be, yes.	21	application which provides intervenors the
22	GREENE, KC:	22	opportunity to ask questions on why we're
$\begin{vmatrix} 22\\23 \end{vmatrix}$	Q. So it could have, over time, some	23	doing certain things and how we're
24	significant changes to Newfoundland Power's	23	approaching it and which alternatives we've
25	operations, is that correct?	25	considered. So that's been effective, I
25	-	23	
	Page 30 MR. CHUBBS:	1	Page 32 holiova for those processes. That's how we
$\begin{vmatrix} 1 \\ 2 \end{vmatrix}$		1	believe, for those processes. That's how we
$\begin{vmatrix} 2\\ 2 \end{vmatrix}$	A. It could over time, yes.	2	see this unfolding as well, but it certainly
3	GREENE, KC:	3 4	would not be opposed to any stakeholder
4	Q. And there was another RFI, PUB-NP-151 which	4	discussions that narties may be interested
	and the heavy Nerviteria diam di Derven tenegang any		discussions that parties may be interested
5	goes to how Newfoundland Power foresees any	5	in, happy to talk about it.
6	involvement or consultation with your	5 6	in, happy to talk about it. GREENE, KC:
6 7	involvement or consultation with your stakeholders being the Board, of course, who	5 6 7	in, happy to talk about it. GREENE, KC: Q. Now moving to operating costs. You've
6 7 8	involvement or consultation with your stakeholders being the Board, of course, who is responsible for ensuring the operations	5 6 7 8	in, happy to talk about it. GREENE, KC: Q. Now moving to operating costs. You've already heard that Newfoundland Power, in
6 7 8 9	involvement or consultation with your stakeholders being the Board, of course, who is responsible for ensuring the operations of the facility and your other stakeholders,	5 6 7 8 9	<ul> <li>in, happy to talk about it.</li> <li>GREENE, KC:</li> <li>Q. Now moving to operating costs. You've already heard that Newfoundland Power, in this application, is looking for 5.5 percent</li> </ul>
6 7 8 9 10	involvement or consultation with your stakeholders being the Board, of course, who is responsible for ensuring the operations of the facility and your other stakeholders, and the answer there is "No, there is no	5 6 7 8 9 10	<ul> <li>in, happy to talk about it.</li> <li>GREENE, KC:</li> <li>Q. Now moving to operating costs. You've already heard that Newfoundland Power, in this application, is looking for 5.5 percent increase overall, and of that 5.5 percent,</li> </ul>
6 7 8 9 10 11	involvement or consultation with your stakeholders being the Board, of course, who is responsible for ensuring the operations of the facility and your other stakeholders, and the answer there is "No, there is no consultation or other than updates in the	5 6 7 8 9 10 11	<ul> <li>in, happy to talk about it.</li> <li>GREENE, KC:</li> <li>Q. Now moving to operating costs. You've already heard that Newfoundland Power, in this application, is looking for 5.5 percent increase overall, and of that 5.5 percent, 1.6 percent is due to operating costs, is</li> </ul>
6 7 8 9 10 11 12	involvement or consultation with your stakeholders being the Board, of course, who is responsible for ensuring the operations of the facility and your other stakeholders, and the answer there is "No, there is no consultation or other than updates in the capital budget application." Do you foresee	5 6 7 8 9 10 11 12	<ul> <li>in, happy to talk about it.</li> <li>GREENE, KC:</li> <li>Q. Now moving to operating costs. You've already heard that Newfoundland Power, in this application, is looking for 5.5 percent increase overall, and of that 5.5 percent, 1.6 percent is due to operating costs, is that correct, Mr. Chubbs?</li> </ul>
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1	0	Page 33	1	Page 35
	Q.	One of the explanations so far provided by	1	MR. CHUBBS:
$\begin{vmatrix} 2 \\ 2 \end{vmatrix}$		Newfoundland Power is the impact of	2	A. Right, so the key change there, there would
3		inflation, but you've always mentioned that	3	be two costs that we're seeing related to
4		other costs are increasing that are	4	other company fees with cyber security.
5		contributing to that significant increase in	5	GREENE, KC:
6		operating costs that are beyond inflation,	6	Q. And perhaps if you want, while we're talking
7		is that correct?	7	about it, if you could go to PUB-NP-141C.
8		CHUBBS:	8	There we go. So we do see that it more than
9	A.	Yes, that's correct.	9	doubled, but it's only 300,000 of their
10		NE, KC:	10	900,000.
11	Q.	I'd like for us to look at information	11	MR. CHUBBS:
12		system technology, so if we could go to PUB-	12	A. Correct. So a few things that we've
13		NP-022, Attachment A. So here, these would	13	implemented over the last few years and I
14		be all the costs associated with your	14	think it's important to highlight our focus
15		information systems, is that correct?	15	on cyber security. About five years ago we
16		CHUBBS:	16	introduced a cyber security risk management
17	A.	Yes, that's correct.	17	program at Newfoundland Power. This was a
18		NE, KC:	18	response to heightened cyber security risks
19	Q.	And if we look at the increase in the bottom	19	that I would say all businesses are dealing
20		line from the 2023 test year to the 2026	20	with, but utilities in particular have been
21		forecast from 7.3 million to 9.2 million,	21	identified as key targets for threat actors
22		that would be an increase of about 25	22	out there, right, organizations looking to
23		percent, is that correct? Subject to	23	cause disruption. So when we implemented
24		checking my math.	24	that program, we worked with an external
25	MR. C	CHUBBS:	25	consultant, PWC, who have expertise in this
		Page 34		Page 36
	A.	Subject to check, yes.	1	area, and they assessed Newfoundland Power
2		NE, KC:	2	from a number of perspectives, but really
3	Q.	And I don't have a math background, but I'm	3	they're looking at, you know, what
4		pretty sure that's correct. And even if we	4	vulnerabilities or what approaches may
5		looked at your 2022 test year from 6.4	5	hackers take to access our infrastructure.
6		million up to the 9.2, we would get an	6	So it could be as simple as getting on to
7		increase of over 43 percent in your	7	our website and using that to get on to our
8		information systems cost, so I'd like to	8	corporate network, so do we have the
9		talk about each of the categories, other	9	appropriate firewalls in place there. It
10		than labour. The first one is other company	10	could be through fishing, you know, sending
11		fees, and here we see them going from, in	11	a malicious email to an unsuspecting
12		the 2023 test year, 310,000 to 967,000 which	12	employee who clicks on a link and they have
13		according to my math is over a 200 percent	13	now installed software that gives someone
14		increase. So we did ask you to explain the	14	access to our system. It could be gaining
15		increase, and here, if you want to go to the	15	access to a substation and connecting into
16		response or would you—I would like what the		our networks and operating our equipment, so
17		breakdown is and if you like, we can do	17	we've been doing this assessment with PWC
18		cyber security first, which you keep	18	for each year since and that's part of the
19	MD C	mentioning as a significant cost increase. HUBBS:	19 20	cost. GREENE, KC:
20 21			20 21	
$\begin{vmatrix} 21\\22 \end{vmatrix}$	А.	It is, so you're interested in cyber	21	Q. Is that the reason for the 312,000,
$\begin{bmatrix} 22\\23 \end{bmatrix}$		security cost in other company fees or in total?	22	consulting fee paid to PWC? MR. CHUBBS:
23	GPEE	NE, KC:	23 24	A. So that would be within the original 145
24		In other company fees first.	24 25	because we've been doing that for five
	Q.	momer company rees msi.	23	because we ve been using that for five

1	D 15		P 20
1 1	Page 37	1	Page 39
	years. Something new that we've been doing	1	of that, we've contracted a third party who
2	is annual, the annual penetration testing	2	monitors that technology 24/7, so they have
3	that's highlight there, so we, as part of	3	their own 24/7 operation and they're
4	our understanding, you know, how secure we	4	monitoring this for many, many utilities and
5	are, we hire hackers, you know, we hire	5	companies so that if something were to
6	folks who are skilled at this to try and	6	happen, they will pick it up immediately and
7	access our systems in a number of ways and	7	can get in touch with who they need to get
8	we let them on our system and see how they	8	in touch with at Newfoundland Power and we
9	can move about, what they can access	9	can unplug or whatever we got to do, to stop
10	internally, and this identifies if here are	10	that activity, so that's an annual service
11	any weaknesses in our technologies, in our	11	that we pay.
12	firewalls and our monitoring services that	12	GREENE, KC:
13	we have in place as well.	13	Q. And these are different consultants, I
14	(9:45 a.m.)	14	assume, and they're all within the 312,000
15	GREENE, KC:	15	forecast for 2026 as consulting fees for IT,
16	Q. So again, that's in the 312,000.	16	is that correct?
17	MR. CHUBBS:	17	MR. CHUBB:
18	Q. That's in the 312 and that would be in	18	A. Yes, that's correct.
19	incremental. Incident response support, so	19	GREENE, KC:
$\begin{array}{c} 1 \\ 20 \end{array}$	this is a key element of our cyber security	20	Q. Okay, so that still leaves us with
$20 \\ 21$	program is ensuring if you do have an event,	20	\$650,000.00, other than for security of the
$21 \\ 22$	what you have in place, for incident	21	967 that's in your forecast. So we look for
$\begin{vmatrix} 22\\23 \end{vmatrix}$	response, so as I mentioned for storms, we	22	an explanation for that as well, which is if
$\begin{vmatrix} 23\\24 \end{vmatrix}$	have this in place for storms, we have an	23 24	you go down to C and D, well we see D there.
24	<b>A</b>	24 25	
23	incident response plan in place in case, you	23	So for D, half a million for the SIEM
	Page 38		Page 40
1			· 1 · · · · · · · · · · · · · · · · · ·
	know, we were compromised or someone gained	1	service, that was in addition to the
2	access to our customer data or our	2	consulting fees you just outlined, was it?
2 3	access to our customer data or our electricity system or encrypted all of our	2 3	consulting fees you just outlined, was it? MR. CHUBBS:
2 3 4	access to our customer data or our electricity system or encrypted all of our data and we had no access to technology, so	2 3 4	<ul><li>consulting fees you just outlined, was it?</li><li>MR. CHUBBS:</li><li>A. No, it says there, well it's related to due</li></ul>
2 3 4 5	access to our customer data or our electricity system or encrypted all of our data and we had no access to technology, so we have response plans for all of that which	2 3 4 5	<ul><li>consulting fees you just outlined, was it?</li><li>MR. CHUBBS:</li><li>A. No, it says there, well it's related to due to the SIEM service, so the other part of</li></ul>
2 3 4 5 6	access to our customer data or our electricity system or encrypted all of our data and we had no access to technology, so we have response plans for all of that which include customer communications and the	2 3 4 5 6	<ul><li>consulting fees you just outlined, was it?</li><li>MR. CHUBBS:</li><li>A. No, it says there, well it's related to due to the SIEM service, so the other part of that technology so that SIEM service, you're</li></ul>
2 3 4 5 6 7	access to our customer data or our electricity system or encrypted all of our data and we had no access to technology, so we have response plans for all of that which include customer communications and the supports that we would need externally to	2 3 4 5 6 7	<ul><li>consulting fees you just outlined, was it?</li><li>MR. CHUBBS:</li><li>A. No, it says there, well it's related to due to the SIEM service, so the other part of that technology so that SIEM service, you're paying the software and licensing fee for</li></ul>
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	Page 41		Page 43
1	programming skills to implement any changes	1	technology, our software, similar to how we
2	or upgrades that need to occur on that	2	manage our infrastructure. We put a piece
3	system, over the next few years. We see	3	of technology in place and we use that
4	that as a, you know, more of a short-term	4	technology for as long as we can to get the
5	measure as we develop those skills	5	maximum benefit from that technology. So, I
6	internally at Newfoundland Power. So we see	6	would say for the most part what you're
7	that up to 2025, but I don't see that as a	7	seeing here is technologies that arethat's
8	longer-term cost.	8	been indicated by the vendors that they will
9	GREENE, KC:	9	no longer be supported past a certain date.
10	Q. And there's no breakdown between those two	10	So, you know, a couple of examples in here
11	and the 300 million and the 5 million gets	11	I mentioned our asset management technology.
12	us to 800,000—half million, gets us to	12	So, that vendor advised us that that system
13	800,00 but there's still another 150,000 not	13	is no longer supported past December 31st,
14	explained which isn't on the record, so I'd	14	2026. Our GIS system, as I mentioned
15	ask for an undertaking that we could have a	15	before, the version that we use of that
16	breakdown of the other consulting fees by	16	today isbeen indicated by the vendor will
17	each fee and the amount so that we can see	17	no longer be supported past December 1st,
18	the total.	18	2027, and our Outage Management system
19	MR. CHUBBS:	19	similarly is February 2028.
20	A. Okay.	20	So, with technologies like this, you
21	MS. GLYNN:	21	know, they're critical to our operations.
22	Q. That would be Undertaking No. 9.	22	We cannot effectively operate unsupported,
23	GREENE, KC:	23	so that means we need to replace these
24	Q. If we go back to PUB-NP-002, Attachment A,	24	technologies, and that's what we have
25	we see other computing equipment and	25	
	Page 42		Page 44
			1 age 44
1	c	1	
$\begin{vmatrix} 1\\ 2 \end{vmatrix}$	software and they're broken down by topics,	1 2	incorporated in our plan.
2	software and they're broken down by topics, so we did actually ask for a breakdown of	2	incorporated in our plan. We're seeing the market for technology
2 3	software and they're broken down by topics, so we did actually ask for a breakdown of those, so now—because these were main	2 3	incorporated in our plan. We're seeing the market for technology fees increasing beyond inflation. We use
2 3 4	software and they're broken down by topics, so we did actually ask for a breakdown of those, so now—because these were main categories, so can we go now to PUB-NP-140,	2 3 4	incorporated in our plan. We're seeing the market for technology fees increasing beyond inflation. We use consulting services to help us understand,
2 3 4 5	software and they're broken down by topics, so we did actually ask for a breakdown of those, so now—because these were main categories, so can we go now to PUB-NP-140, Attachment A, which provides the details for	2 3 4 5	incorporated in our plan. We're seeing the market for technology fees increasing beyond inflation. We use consulting services to help us understand, you know, the appropriate technologies,
2 3 4	software and they're broken down by topics, so we did actually ask for a breakdown of those, so now—because these were main categories, so can we go now to PUB-NP-140, Attachment A, which provides the details for each of those costs. So if you look, you	2 3 4	incorporated in our plan. We're seeing the market for technology fees increasing beyond inflation. We use consulting services to help us understand, you know, the appropriate technologies, right size for our business, and they also
2 3 4 5 6 7	software and they're broken down by topics, so we did actually ask for a breakdown of those, so now—because these were main categories, so can we go now to PUB-NP-140, Attachment A, which provides the details for each of those costs. So if you look, you will see that this is the additional	2 3 4 5 6 7	incorporated in our plan. We're seeing the market for technology fees increasing beyond inflation. We use consulting services to help us understand, you know, the appropriate technologies, right size for our business, and they also advise us on what's happening in terms of
2 3 4 5 6	software and they're broken down by topics, so we did actually ask for a breakdown of those, so now—because these were main categories, so can we go now to PUB-NP-140, Attachment A, which provides the details for each of those costs. So if you look, you will see that this is the additional breakdown and here we do see some	2 3 4 5 6 7 8	incorporated in our plan. We're seeing the market for technology fees increasing beyond inflation. We use consulting services to help us understand, you know, the appropriate technologies, right size for our business, and they also advise us on what's happening in terms of cost to help us understand what we can
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	Page 45		Page 47
1	driving licensing fees. And the other thing	1	That's my first question. And my second one
2	that's occurring is related to cyber	2	is, can rate payers expect to see these
3	security. So, we have I'll call direct	3	types of increases every three years?
4	cyber security cost at Newfoundland Power	4	MR. CHUBBS:
5	for technologies that specifically serve	5	A. We routinely review our approach to
6	that purpose.	6	technology investment. We do it
7	One of the threatsone of theas I	7	specifically by technology, every time we
8	mentioned, the different approaches that	8	replace a piece of technology. So, we
9	hackers to take to access your technology,	9	evaluate the alternatives, first off whether
10	is they can find a vulnerability in a third	10	we need that technology or not, and a great
11	party piece of software you have, right, and	11	example of that one was just last year we
12	they use that to gain access to your	12	upgraded our Workforce Management system,
12	networks, and we've seen some significant	13	which is that system that electronically
14	cyber security incidents happen at	14	dispatches work to our crews. And we saw,
15	organizations because of exactly that. You	15	as I described, the incremental increase in
16	know, I saw a headline the other day from	16	the ongoing licensing fee compared to the
17	-	17	old technology that we were using, and we
	Halifax. The province -		
18	GREENE, KC:	18	evaluated is this worthwhile anymore at Newfoundland Power.
19	Q. Yes, we're all familiar with the risk of	19	
20	cyber security, and the recent one with	20	So, we evaluated what would happen if
21	automobiles, but -	21	we went back to paper, you know, if we had
22	MR. CHUBBS:	22	to go back to dispatching work in bundles of
23	A. You got me going now.	23	paper to crews in the field, and what
24	GREENE, KC:	24	resources we would need to accomplish that,
	GREENE, KC:	24 25	resources we would need to accomplish that,
24	Page 46		Page 48
24 25 1	Page 46 Q. Yes, and I'myou don't need to go there.	25 1	Page 48 and it was clear that the Workforce
24 25 1 2	Page 46	25	Page 48
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24 25 1 2	Page 46 Q. Yes, and I'myou don't need to go there. MR. CHUBBS:	25 1 2	Page 48 and it was clear that the Workforce Management system still continued to be a
24 25 1 2 3	Page 46 Q. Yes, and I'myou don't need to go there. MR. CHUBBS: A. But anyway, that's a driver. That is a	25 1 2 3	Page 48 and it was clear that the Workforce Management system still continued to be a least cost, and that was part of our capital
24 25 1 2 3 4	Page 46 Q. Yes, and I'myou don't need to go there. MR. CHUBBS: A. But anyway, that's a driver. That is a driver, and what it is doing is it's driving more cost to these companies, and more	25 1 2 3 4	Page 48 and it was clear that the Workforce Management system still continued to be a least cost, and that was part of our capital budget application and identified as one of
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	Page 53		Page 55
1	unplanned. So, we do have trees contacting	1	A. Well, we chuckle at that, but that was
2	power lines on a regular basis. Often times	2	actually something that was highlighted in
3	it's a tree that's outside of the right-of-	3	the Provincial Government's Climate
4	way that we've cleared that dies and falls,	4	Adaptation Plan, that the growing season in
5	and falls and makes contact with a line, and	5	Newfoundland is actually getting longer.
6	so we have to respond to that to restore	6	GREENE, KC:
7	power and clear that tree from that line.	7	Q. I was going to say, tell that to my plants
8	So, those are the three main drivers.	8	and shrubs please.
9	We seen, and this is highlighted in	9	MR. CHUBBS:
10	PUB-NP-141when we look at the number of	10	A. Yes, but it'syou know, it's hard to
11	inspection driven vegetation work orders	11	pinpoint exactly what's driving it. We're
12	that we've completed, we did aboutwe're	12	finding more work out there to get
13	doing about 400 a year of those jobs. The	13	completed. It may be a longer growing
13	last three years has been 578, that's the	14	season that's driving it, but I can say
15	average. So, that's a 45 percent increase	15	that, you know, it's an important aspect of
16	in that work. So, that's a key driver of	16	our operations, and if you're not clearing
17	the cost.	17	trees from your lines, that's going to cause
17	And then second, on the customer	18	further cost, and you're going to beas I
19	requests, we've gone from 1,589 on average	19	was mentioning yesterday, if you don't do
20	per year to 1,770 on average per year. So,	20	that in a planned fashion, you'll be out in
20	that's an 11 percent increase in the number	20	the middle of the night clearing it from the
$21 \\ 22$	of customers contacting Newfoundland Power	21	line on overtime, right. And I would also
$\begin{bmatrix} 22\\23 \end{bmatrix}$	and requesting trees trimmed on their	22	point out, and this is worth mentioning,
23	property.	23 24	that when you look at the impacts of
25	property.	25	that when you look at the impacts of
	Dage 54	20	Paga 56
	Page 54	1	Page 56 Hurricane Fiona in PEL and Nova Scotia a
1	GREENE, KC:	1	Hurricane Fiona in PEI and Nova Scotia, a
1 2	GREENE, KC: Q. You mentioned that you do the inspections.	1 2	Hurricane Fiona in PEI and Nova Scotia, a huge part of the impact that that had on
1 2 3	<ul><li>GREENE, KC:</li><li>Q. You mentioned that you do the inspections. I understand that distribution inspections,</li></ul>	1 2 3	Hurricane Fiona in PEI and Nova Scotia, a huge part of the impact that that had on their system was trees into lines, right.
1 2 3 4	<ul><li>GREENE, KC:</li><li>Q. You mentioned that you do the inspections. I understand that distribution inspections, you do them twice in a seven year cycle, is</li></ul>	1 2 3 4	Hurricane Fiona in PEI and Nova Scotia, a huge part of the impact that that had on their system was trees into lines, right. So, when you think of climate adaptation,
1 2 3 4 5	<ul><li>GREENE, KC:</li><li>Q. You mentioned that you do the inspections. I understand that distribution inspections, you do them twice in a seven year cycle, is that correct?</li></ul>	1 2 3 4 5	Hurricane Fiona in PEI and Nova Scotia, a huge part of the impact that that had on their system was trees into lines, right. So, when you think of climate adaptation, it's only becoming more important that you
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1	Page 57	1	Page 59
	cost to do more inspections, so you need to	1	Q. And because of the settlement agreement,
2	be confident that you're off-setting your	2	approximately half a million dollars will
3	vegetation cost. What I would expect is	3	come out of 2026 forecast for fees to
4	your vegetation cost won't decrease, right.	4	reflect the settlement agreement. That's
5	Trees are still growing. So, if you inspect	5	correct, right?
6	more frequently means you're inspecting more	6	MR. CHUBBS:
7	kilometres per year. So, we'll probably	7	A. That's correct, yes. It also includes
8	still be doing the 578 per year, but you	8	engineering consultants. So, when we need
9	would incur some additional cost when it	9	specific expertise on an engineering project
10	comes to, you know, the labour to inspect	10	we'll hire consultants to support us there
11	the lines.	11	and, you know, things related to Human
12	You mightit mightthere may be an	12	Resources, if there's any legal fees there
13	opportunity there where may be you're	13	that or employee assistance fees that we
14	picking up something a year in advance that	14	incur. And then we went through the
15	doesn't fall into the line in the future so	15	technology costs as well, right, so those
16	it might have some impact on the unplanned	16	external monitoring service and support
17	piece of work. So, it's certainly worth	17	service. So, there's a fair amount of
18	consideration.	18	activity in that.
19	GREENE, KC:	19	What we're seeing is some of the key
20	Q. The last area of operating cost that you	20	drivers in other company fees over the next
21	have referred to is increasing beyond	21	few years. Outside of technology and cyber
22	inflation these other company fees, and if	22	security that we already mentioned in IFRS,
23	we look here on the same page that's on the	23	is regulation. So, we've got fees in there
24	screenit is line 19, and here again we see	23	thatyou know, Hydro are expected to file
25	serven reis inte 19, und nere ugun we see	25	
	Page 58		Page 60
1	a significant increase from 2.5 million in	1	their next General Rate Application I think
2	2023 test year to 4.7 million in 2026, which	2	next year. So, we will be a part of that
3	is an 81 percent increase, definitely more	3	proceeding. So, there's fees associated
4	than inflation. There are a number of RFI's	4	with that and, you know, maybe expert fees
5	because you report the fees under different	5	as well. Legal fees certainly. The
6	categories, but there's no one response that	6	Reliability Resource Adequacy proceeding,
7	details all of the other company fees. Can	7	and we should see an update report to that,
8	you tell us the main ones that are included	8	and I think the expectation is there's going
9	in the 4.7 million rate payers will be asked	9	to be some applications for new generation
10	to pay for?	10	on the Island, and Newfoundland Power is
11	MR. CHUBBS:	11	very interested in the outcome of that
12	A. So, our other company fees are fees where we	12	proceeding. So, we have fees in there
13	pay to external organizations or consultants	13	associated with those regulatory
14	to support us in different aspects of our	14	proceedings, and then, you know, 2026 we'll
15	operations. For example, you know, audit,	15	be thinking about our next Rate Application,
16	our audit fees; legal fees; regulatory fees,	16	right. So, we look three years out from
17	such as experts for these types of	17	today, you know, we're probably looking
18	proceedings; depression experts and such.	18	well, we're looking at a depreciation study
19	In here is also the IFRS conversion, right.	19	likely in 2026 and, you know, the associated
20	So, that's another company fee that we see	20	legal and expert fees as we're preparing for
21	that's part of this amount. That's, I'll	20	our Rate Application as well. So, all those
22	say, one time, but it's over a three year	22	fees are what would make up this estimate.
23	period, right.	23	GREENE, KC:
24	GREENE, KC:	23	Q. And because it's not on the record in terms
25		25	
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	Page 61	1	Page 63
1	of a breakdown of the 4.7 million, I'd ask		key element of that is technology. We've
2	for an undertaking that there will be	2	used a lot of technology to improve ournot
3	provided a list of other company fees by	3	just our efficiency, but also the service we
4	each fee that is included in the 4.7 million	4	provide to customers in terms of outage
5	for 2026 forecast.	5	response, in terms of contacting us, you
6	MS. GLYNN:	6	know, through various means, and it is a
7	Q. Undertaking number 10.	7	continued focus for us. There are specific
8	GREENE, KC:	8	things that we've done in our recent capital
9	Q. So, we've talked about the cost that have	9	budget applications in terms of operational
10	exceeded inflation, and there's already been	10	technologies and application enhancements
11	some questions to you about inflation, and I	11	that reduce cost to Newfoundland Power as
12	go back to questions that have been posed to	12	well.
13	Mr. Murray, Ms. London, and by Mr.	13	We continuallywhen you look at cost,
14	Fitzgerald to you as well. Given the	14	such as technology cost, we're evaluating
15	significant increase customers are looking	15	the least cost solution for our customers
16	at of over 20 percent, 23 percent by July 1	16	where we can, where we negotiate software
17	of 2025, of which almost 20 percent, or 19	17	licensing agreements. We're looking for
18	percent, would be cost from Newfoundland	18	long-term contracts so that the variability
19	Power, some of that would be the flow	19	in cost is minimized as much as it can be.
20	through of power supply cost, and I've taken	20	So, I think it's important for the Board and
21	off the 2.25 for the rate mitigation—in	21	for our customers to understand that it is a
22	looking at that; I'm looking at some of the	22	constant conversation at Newfoundland Power
23	significant increases, what action did	23	how we can reduce cost.
24	Newfoundland Power take to see if any of	24	We have experienced above average
25		25	
	Page 62		Page 64
1	these costs could be deferred to a later	1	inflationary pressures in recent years that
2	period, or whether they were absolutely	2	are in line with GDP and what, you know, the
3	necessary.	3	economy has seen over the last few years.
4	MR. CHUBBS:	4	So, we're not immune to that. That has
5	A. I thinkas I mentioned yesterday, you know,	5	certainly put pressures on our costs, but
6	operating efficiency in Newfoundland Power	6	we're doing everything we can to manage that
7	is a constant conversation. That's	7	for our customers.
8	something that we're always talking about.	8	GREENE, KC:
9	It's on our minds, and we dowe've done a	9	Q. And I think I made the same comment. It
10		10	
	lot of things over the last decade, and in	10	appears Newfoundland Power is carrying on
11	recent years, that have improved the	10 11	appears Newfoundland Power is carrying on with this application as business as usual
11 12	e		
	recent years, that have improved the	11	with this application as business as usual
12 13 14	recent years, that have improved the efficiency of our operations. I won't take you through them all unless you really want me to.	11 12 13 14	with this application as business as usual and there was no need for them to take any
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	Page 65		Page 67
1	COMMISSIONER O'BRIEN:	1	of Service Study is found in Volume 2 of the
2	Q. No questions.	2	application. In my testimony, I will speak
$\overline{3}$	CHAIR:	3	to Newfoundland Power's rate designs, cost
	Q. And I've got no questions either.	4	of service matters, including customer
	MR. O'BRIEN:	5	contributions.
5			
6	Q. Nothing in re-direct.	6	MR. O'BRIEN:
1	MS. GLYNNE:	7	Q. And are there any changes you'd like to make
8	Q. Well, I guess we will take a quick break to	8	to the pre-filed evidence or the relevant
9	change witnesses. Thank you, Mr. Chubbs.	9	exhibits?
10	(BREAK – 10:19 a.m.)	10	MR. COMERFORD:
11	(RESUME – 10:30 a.m.)	11	A. Not at this time.
12	CHAIR:	12	MR. O'BRIEN:
13	Q. So, Mr. Brien, got your new witness?	13	Q. Mr. Comerford, is Newfoundland Power
14	MR. O'BRIEN:	14	proposing any changes to its rate designs as
15	Q. Thank you, Mr. Chair. Our next witness is	15	part of this GRA?
16	Michael Comerford and he's going to be	16	MR. COMERFORD:
17	affirmed.	17	A. No, Newfoundland Power has not proposed any
18	MR. MICHAEL COMERFORD, AFFIRMED, EXAMINATION-IN-CHIEF	18	changes in its rate designs or cost of
19	BY MR. LIAM O'BRIEN	19	service methodology as a part of the 2025-
20	CHAIR:	20	2026 GRA. The company is proposing the
21	Q. Back to you, Mr. O'Brien.	21	average customer rate increase be applied to
22	MR. O'BRIEN:	22	all customer rate classes. Newfoundland
23	Q. Thank you, Mr. Chair. Mr. Comerford, would	23	Power is currently in the process of
24	you please introduce yourself?	24	completing a rate design review with input
25		25	from the Board, Consumer Advocate and Hydro.
	Page 66		Page 68
1	MR. COMERFORD:	1	Given changes underway on the Island
2	A. Yes, good morning. I'm Michael Comerford,	2	Interconnected System, including the
3	Director of Rates and Supply at Newfoundland	3	integration of the Muskrat Falls Project, it
4	Power.	4	would not be appropriate to implement new
5	MR. O'BRIEN:	5	rate designs until they are comprehensively
6		6	reviewed. This includes evaluating
	background and prior roles at Newfoundland	7	alternative rate designs and understanding
		8	the impacts they would have on customers.
9		9	MR. O'BRIEN:
10		10	Q. Mr. Comerford, the Consumer Advocate's
11	in business administration. I joined	11	expert, Mr. Bowman, is recommending changes
11		12	to the company's rate designs as part of
12	automation engineer and became	12	this GRA. What changes is he proposing?
	e		0 1 1 0
14		14	MR. COMERFORD:
15	6 5	15	A. Mr. Bowman is recommending that Newfoundland
16	6.	16	Power modify its rate designs to reflect
17	11 2	17	lower marginal energy costs. His
18		18	recommendation is based on changing cost
19		19	dynamics on the provincial electricity
20		20	system. For domestic customers, Mr. Bowman
21	MR. COMERFORD:	21	recommends moving from a flat energy charge
22	A. I'm adopting as my testimony Section 5 of	22	to a two-block energy charge. The second
23	the evidence, including Newfoundland Power's	23	block would be lower than the first.
24	<b>e</b> .	24	Newfoundland Power's general service
25	the company's rebuttal evidence. The Cost	25	customer rates including a declining block

Project         Project           1         rate structure. Mr. Bowman recommends         1         the reasonableness of a utility's rates.           2         reducing the second block further to be more reflective of marginal costs.         3         its customer rates by comparing the revenue           4         MR. OBRIFN:         4         collected from each class with a cost to           5         Q. Mr. Comerford, why doesn't Newfoundland         5         cost to which is determined in the cost           7         recommendations in the area of rate design?         7         of service study. As per past rulings of           8         MR. COMERFORD:         8         the Board, Newfoundland Power has focused on           10         New foundland Power's rate design review.         10         the range of 90 percent to 100 percent.           11         Company is undertaking a rate design review.         11         This achieves fairness in rate design and           12         resultation with the Board, the Consumer         14         Advocate and Hydro. Newfoundland Power has           14         Advocate and Hydro. Newfoundland Power has         16         for customers in each rate class. As a           16         design review in helding that read to be considered         18         resultation with the Board, the Consumer           14         Advocate and Hyd		27, 2024		NP 2025-2026 GRA
2       reducing the second block further to be more       2       Newfoundland Power assess the fairness of         3       reflective of marginal costs.       3       its eustomer rates by comparing the revenue         4       Collected from each class with a cost to       5       0.       MR. OBRIEN:       4       collected from each class with a cost to         5       Q.       MR. Comerford, why doesn't Newfoundland       5       serve that class. This is the revenue to         6       Power agree with Mr. Bowman's       6       cost ratio which is determined in the cost         7       recommendations in the area of rate design?       7       of service study. As per past rulings of         8       MR. COMERFORD:       8       the Board, Newfoundland Power has class maintaining revenue to cost ratio which in the cost         10       Newfoundland Power's assess in rate       10       the range of 90 percent. 101 percent.         11       consultation with the Board, Newfoundland Power has       14       reveals revenue to cost ratios which asses. As a         12       also engaged a consultant to assist in rate       15       for sustomers in each rate class. As a         13       consultation with the Board, Newfoundland Power hasses.       16       result, add as previously mentioned, the         14       Advocate and Figure.       17 <t< td=""><td>1</td><td>•</td><td></td><td>Page 71</td></t<>	1	•		Page 71
3       reflective of marginal costs.       3       is customer rates by comparing the revenue         4       MR. O'BRIEN:       4       collected from each class with a cost to         5       Q.       Mr. Comerford, why doesn't Newfoundland       5       serve that class. This is the revenue to         6       Power agree with Mr. Bowman's       6       cost ratio which is determined in the cost         7       recommendations in the are of rate design?       7       of service study. As per past rulings of         8       MR. COMERFORD:       8       the Board, Newfoundland Power's state design review.       11         11       consultation with the Board, the Consumer       13       of service study filed with our application         12       The rate design review is being completed in       16       reveals revenue to cost ratios in this range         15       also engaged a consultant to assist in rate       16       result, and as previously metioned, the         16       design. These include potential changes to       20       Q. Can you explain how the company ensures it's         18       other factors that need to be considered       18       rate increase to all customer rate classes.         19       when making changes to customer rate       20       Q. Can you explain how the company ensures it's         21 <td< td=""><td>1</td><td>rate structure. Mr. Bowman recommends</td><td></td><td></td></td<>	1	rate structure. Mr. Bowman recommends		
4       MR. OBRIEN:       4       collected from each class with a cost to         5       Q.       Mr. Comerford, why doesn't Newfoundland       5       serve that class. This is the revenue to         6       Power agree with Mr. Bowman's       6       cost ratio which is determined in the cost         7       recommendations in the area of rate design?       7       8       the Board, Newfoundland Power has closed on         9       A.       Mr. Bowman is recommending changes in       9       maintaining revenue to cost ratios within         10       Newfoundland Power's strate design review.       10       the range of 90 percent to 110 percent.         11       company is undertaking a rate design review.       the consumer       avoids undue cross subsidization. The cost         13       consultation with the Board, hee Consumer       10       reveals revenue to cost ratios in this range         14       Advocate and Hydro. Newfoundland Power has       14       reveals revenue to cost ratios in this range         15       also engaged a consultatit to assist in rate       15       for customers in each rate classes. As a         16       designs. These include potential changes to       17       company is undertakes. As a         10       baccustomer charges and demages in       20       Q.       Can you explain how the company ensures it's	2	reducing the second block further to be more		Newfoundland Power assesses the fairness of
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6       Power agree with Mr. Bowman's recommendations in the area of rate design?       6       cost ratio which is determined in the cost of service study. As per part rulings of maintaining revenue to cost ratios within         7       MR. COMREFORD.       8       the Board, Newfoundland Power has facused on maintaining revenue to cost ratios within         10       Newfoundland Power's rate design review.       11       The rate design review is being completed in         11       company is undertaking a rate design review.       11       This achieves fairness in rate design and         14       Advocate and Hydro. Newfoundland Power has       14       The rate design review.       13         15       also engaged a consultation with the Board, Hores and Carges and Hydro. Newfoundland Power has       16       result, and as previously mentioned, the         17       marginal energy costs, there are several       17       company is proposing to algo phy the average         18       other factors than dead base       20       Can you explain how the company ensures it's         19       when making changes to customer rate       19       MR. O'BRLEN:       20         21       treating customers fairly when it cones to       13       reatily and power has         22       that may also be appropriate. Changes in       21       rule markes and regulations, contribution in aid         22<	4	MR. O'BRIEN:	4	collected from each class with a cost to
6       Power agree with Mr. Bowman's       6       cost ratio which is determined in the cost         7       recommendations in the area of rate design?       7       of service study. As per past rulings of         9       A. Mr. Bowman is recommending changes in       9       maintaining revenue to cost ratios within         10       Newfoundland Power has fecused on       10       the range of 90 percent to 110 percent.         11       company is undertaking a rate design review.       11       This achieves fairness in rate design and         12       The rate design review is being completed in       13       of service study filed with our application         14       Advocate and Hydro. Newfoundland Power has       14       reveals and as previously mentioned, the         15       also engaged a consultant to assist in rate       15       for customers in each rate class. As a         16       result, and as previously mentioned, the       result, and as previously mentioned, the         18       other factors that need to be considered       18       rate increase to all customer rate classes.         21       basic customer charges and demand charges       21       treating customers fairly when it comes to         23       customer rate designs require input from       25       maintain preview it costomer         24       considered as a part	5	Q. Mr. Comerford, why doesn't Newfoundland	5	serve that class. This is the revenue to
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9       A. Mr. Bowman is recommending changes in 10       9       maintaining revenue to cost ratios within 10         10       Newfoundland Power's rate designs while the 11       10       the range of 90 percent to 110 percent.         12       The rate design review, is being completed in 13       consultation with the Board, the Consumer 14       Advocate and Hydro. Newfoundland Power has 15       avoids undue cross sublaid/ration. The cost of service study filed with our application 16       reveals revenue to cost ratios in this range 15         16       design review, in addition to changes in 16       reveals revenue to cost ratio sin this range 16       reveals revenue to cost ratios in this range 17         18       other factors that need to be considered 19       Wh en making changes to customer rate 19       When making changes to customer rate 19       When making changes to customer rate 19       20       Q. Can you explain how the company ensures it's 10         21       basic customer rate classes will also be 22       23       MR. COMERFORD: 24       24       A       Newfoundland Power ensures fairness to 25       20       Q. Can you explain how the company ensures to 25       23       MR. COMERFORD: 24       24       A       Newfoundland Power ensures fairness to 26       26       27       24       A       Newfoundland Power ensures fairness to 27       28       28       29       24       A       Newfoundland Power ensures fairness to 28	8	MR. COMERFORD:	8	
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	11 12 13 14 15 16 17 18 19 20 21 22	<ul> <li>could cause peak demand on the electricity system to increase at a time when the electricity system is capacity constrained. Changes in rate design should follow a comprehensive review which the company is in the process of conducting.</li> <li>MR. O'BRIEN:</li> <li>Q. Now, Mr. Comerford, your evidence will address cost of service as well. What can you tell the Board about the embedded cost of service study filed with the company's application?</li> </ul>	11 12 13 14 15 16 17 18 19 20 21 22	not recovered through customer rates. The contribution in aid of construction policy is used to determine how much a customer will be required to pay upfront for their electrical service. The policy recognizes that service to some customers will not be fully recovered through their electricity rates. As a result, they have to pay an upfront amount. Newfoundland Power reviews all general service CIAC's after two years to determine if there should be any additional charge or refund provided to the customer.
25accepted as the basis standard in assessing25costs to each customer class. The company's	11 12 13 14 15 16 17 18 19 20 21 22 23	<ul> <li>could cause peak demand on the electricity system to increase at a time when the electricity system is capacity constrained. Changes in rate design should follow a comprehensive review which the company is in the process of conducting.</li> <li>MR. O'BRIEN:</li> <li>Q. Now, Mr. Comerford, your evidence will address cost of service as well. What can you tell the Board about the embedded cost of service study filed with the company's application?</li> <li>MR. COMERFORD:</li> </ul>	11 12 13 14 15 16 17 18 19 20 21 22 23	not recovered through customer rates. The contribution in aid of construction policy is used to determine how much a customer will be required to pay upfront for their electrical service. The policy recognizes that service to some customers will not be fully recovered through their electricity rates. As a result, they have to pay an upfront amount. Newfoundland Power reviews all general service CIAC's after two years to determine if there should be any additional charge or refund provided to the customer. The cost of service methodology
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1 .	Page 73		Page 75
	cost of service methodology was reviewed in	1	correct?
$\begin{vmatrix} 2 \\ 2 \end{vmatrix}$	detail at the request of the Board as part	2	MR. COMERFORD:
3	of the company's 2003 General Rate	3	A. Yes, that's correct. I graduated from
	Application. Adherence to these schedules,	4	Memorial University in 2002 with a Bachelor
5	policies and methodologies ensures customers	5	of Engineering degree and again in 2013 with
6	are treated fairly.	6	a master's in business.
7	MR. O'BRIEN:	7	FITZGERALD, KC:
8	Q. Now, Mr. Comerford, what recommendations is		Q. Okay. And what were you doing between 2002
9	Mr. Bowman making in relation to the	9	and 2013?
10	company's approved schedule or rates, rules	10	MR. COMERFORD:
11	and regulations, cost of service methodology	11	A. In 2002, I started my career with a local
12	and the CIAC policy?	12	engineering firm. I was there for five
13	MR. COMERFORD:	13	years. It was a – I did a lot of
14	A. Mr. Bowman's recommendations are based on	14	interesting work actually with renewable
15	various positions, particularly as they	15	energy systems in Labrador. But after five
16	relate to radial transmission facilities and	16	years of that, I started to be employed by
17	facilities that benefit just one customer.	17	Newfoundland Power. So, in 2007 to 2013, I
18	MR. O'BRIEN:	18	was employed with Newfoundland Power.
19	Q. And do you agree that changes are required?	19	FITZGERALD, KC:
20	MR. COMERFORD:	20	Q. And you started in what position? You said
21	A. No, I do not. The existing Board approved	21	it, but I didn't quite catch it.
22	policies and methodologies adequately ensure	22	MR. COMERFORD:
23	that customers are treated in a manner that	23	A. I started as a controls and automation
24	is fair and reasonable and not unduly	24	engineer.
25	discriminatory. Newfoundland Power	25	FITZGERALD, KC:
	Page 74		Page 76
1	addressed these positions in the rebuttal	1	Q. And that was just a – were you recruited by
2	evidence filed with the Board on May 28th.	2	Newfoundland Power or did you apply to an
3	MR. O'BRIEN:	3	advertised position or how did that work?
4	Q. Mr. Comerford, does that conclude your	4	MR. COMERFORD:
5	testimony?	5	A. I applied for a position at Newfoundland
6	MR. COMERFORD:	6	Power and found out I had an interview with
7	A. Yes, it does.	7	Newfoundland Power, as a matter of fact,
8	MR. O'BRIEN:		
		8	when I was in Labrador at a remote site.
9	Q. Pass that over to -	9	when I was in Labrador at a remote site. So, I was very pleased to get an interview.
9 10	Q. Pass that over to - CHAIR:	9 10	when I was in Labrador at a remote site. So, I was very pleased to get an interview. FITZGERALD, KC:
10 11	<ul><li>Q. Pass that over to - CHAIR:</li><li>Q. Okay. So, it's over to Consumer Advocate.</li></ul>	9 10 11	<ul><li>when I was in Labrador at a remote site.</li><li>So, I was very pleased to get an interview.</li><li>FITZGERALD, KC:</li><li>Q. Get warmed up. So, currently now, you're</li></ul>
10 11 12	<ul> <li>Q. Pass that over to - CHAIR:</li> <li>Q. Okay. So, it's over to Consumer Advocate. Mr. Fitzgerald.</li> </ul>	9 10 11 12	<ul> <li>when I was in Labrador at a remote site.</li> <li>So, I was very pleased to get an interview.</li> <li>FITZGERALD, KC:</li> <li>Q. Get warmed up. So, currently now, you're the Director of Rates and Supply. I believe</li> </ul>
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Page 77	Page 79
1 MR. COMERFORD: 1 MR. COME	
	have not.
3 a short-term incentive as well, which is 15 3 FITZGERA	
	e you ever designed a retail rate?
5 FITZGERALD, KC: 5 MR. COME	RFORD:
6 Q. 15 percent of your base salary? 6 A. No, t	he rate designs that are currently
7 MR. COMERFORD: 7 place	e at Newfoundland Power had been
8 A. Yes, that's correct. 8 desig	ned prior to my taking on this
9 FITZGERALD, KC: 9 posit	ion.
10 Q. And since when have you been entitled to 10 FITZGERA	
	t. As I understand, as we understand,
	ast rate design for Newfoundland Power
	completed in 2010, correct?
14 entitled to that. 14 MR. COME	
	that's correct.
16 Q. Okay. So, that's relatively recent, and 16 FITZGERA	
	that's what's being used currently?
17 nave you achieved the STI for those past 17 Q. And 18 couple years? 18 MR. COME	
	that's what's being used right now, and
	ndicated in my direct testimony, we
	urrently in the process of conducting a
	rate design review, which of course the
	sumer Advocate and other parties are
· · · · · · · · · · · · · · · · · · ·	cipating in.
25 Q. STI, but are you suggesting not the full 15 25 FITZGERA	LD, KC:
Page 78	Page 80
	. So, it is true though that
	oundland Power is proposing an increase
3 A. No, I believe it was – I can't recall 3 in all	components of each retail rate by the
4 exactly how much it was, but I think it was 4 prope	sed 5.5 percent. Is that correct?
5 pretty close to the 15 percent. 5 MR. COME	RFORD:
	to the extent possible, yes. We
	ed, in preparation for the General Rate
	cation, and in light of all the
	tainties on the system right now with
	ds to wholesale rates and Muskrat Falls
	being included in customer rates that
	ould make a straight five percent
	ase to the rate components for this
	al rate application.
e e e e e e e e e e e e e e e e e e e	
	-
	nd can you just, for the record, what
	e components of the rate?
18 Q. Okay. 18 MR. COMEDI	
	for domestic customers, there's two
-	One is a basic customer charge and
21 FITZGERALD, KC: 21 anoth	er is the energy charge, flat energy
	e. For general service customers,
22 Q. In the past, right. So, in your capacity, 22 charg	
22Q.In the past, right. So, in your capacity,22charg23in that capacity or your current capacity,23there	is a basic customer charge. There's
22Q.In the past, right. So, in your capacity, in that capacity or your current capacity, have you ever designed a rate for electric22charg charg charg charg charg 	

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1	charges are first block and second block	1	system. We are, in fact, right now, at a bi
2	energy charges.	2	of an inflection point, I guess, on the
3	FITZGERALD, KC:	3	electricity system as it relates to Holyrood
4	Q. And so again, the 5.5 percent rate increases	4	effectively becoming less – playing less of
5	is on all those components, for the domestic	5	a role on the system and Muskrat Falls
6	on the basic charge and the energy charge?	6	playing a greater role on the system, and
7	MR. COMERFORD:	7	with that comes a lot of changing cost
8	A. Yes, that is correct.	8	dynamics, including embedded costs, as well
9	FITZGERALD, KC:	9	as marginal costs. So, effectively, as a
10	Q. And likewise for general service for all	10	part of this rate design or this general
11	three components that you just went through,	11	rate application, and in light of the
12	the basic, the demand and the energy charge?	12	uncertainties that are upon us, and as well,
13	MR. COMERFORD:	13	recognizing the fact that we are currently
14	A. Yes, that is correct.	14	in the process of conducting a rate design
15	FITZGERALD, KC:	15	review, we did not make any adjustments to
16	Q. If we could go to CA-NP-118 please? And the	16	our rate designs.
17	answer there to the question Newfoundland	17	FITZGERALD, KC:
18	Power was asked a series of questions	18	Q. Okay. So, the 5.5 rate increase is detached
19	related to rate design for the domestic	19	from any rate design considerations?
20	class and Newfoundland Power indicated to	20	MR. COMERFORD:
21	that question that, in line 20 there,	21	A. The 5.5 percent rate increase was applied to
22	"Newfoundland Power is not proposing any	22	all rate components.
$\begin{bmatrix} 22\\23 \end{bmatrix}$	changes to its rate design at this time."	23	FITZGERALD, KC:
24	That's correct?	24	Q. Without regard to any rate design issues?
25	MR. COMERFORD:	25	MR. COMERFORD:
	Page 82		Page 84
1	A. That's correct, yes.	1	A. That's correct. We're currently in the
2	(10:45 a.m.)	2	process of completing the rate design
3	FITZGERÁLD, KC:	3	review. So, we kept our rate structures and
4	Q. And does that answer come from your	4	marginal costs signalling effectively
5	department?	5	unchanged as a part of this rate
6	MR. COMERFORD:	6	application.
7	A. Well, I mean, that answer is a reflection of	7	FITZGERALD, KC:
8	what was in the General Rate Application and	8	Q. Okay. Can we go to PUB-NP-004A? If you go
9	as a part of our application, as I	9	to page two, at line 16, you say,
10	indicated, we made no changes to our rate	10	"implementation of a new wholesale rate by
11	designs.	11	January 1, 2025 would allow for the change
12	FITZGERALD, KC:	12	in marginal cost to be reflected in the
12	Q. But there are proposed changes, of course,	12	wholesale rate within a reasonable
13			
	to the rates themselves?	14	timeframe. This is consistent with
	to the rates themselves? MR_COMERFORD:	14 15	timeframe. This is consistent with regulatory principle of practical
15	MR. COMERFORD:	15	regulatory principle of practical
15 16	MR. COMERFORD: A. Yes, that is correct.	15 16	regulatory principle of practical attributes." Could you expand on that
15 16 17	MR. COMERFORD: A. Yes, that is correct. FITZGERALD, KC:	15 16 17	regulatory principle of practical attributes." Could you expand on that statement a little bit piece?
15 16 17 18	<ul><li>MR. COMERFORD:</li><li>A. Yes, that is correct.</li><li>FITZGERALD, KC:</li><li>Q. Right. So, was there any thought of doing</li></ul>	15 16 17 18	regulatory principle of practical attributes." Could you expand on that statement a little bit piece? MR. COMERFORD:
15 16 17 18 19	<ul> <li>MR. COMERFORD:</li> <li>A. Yes, that is correct.</li> <li>FITZGERALD, KC:</li> <li>Q. Right. So, was there any thought of doing some rate design prior to just doing the</li> </ul>	15 16 17 18 19	regulatory principle of practical attributes." Could you expand on that statement a little bit piece? MR. COMERFORD: A. Yes. I mean, in general, you know, you do
15 16 17 18 19 20	<ul> <li>MR. COMERFORD:</li> <li>A. Yes, that is correct.</li> <li>FITZGERALD, KC:</li> <li>Q. Right. So, was there any thought of doing some rate design prior to just doing the blunt 5.5 percent across the board average</li> </ul>	15 16 17 18 19 20	regulatory principle of practical attributes." Could you expand on that statement a little bit piece? MR. COMERFORD: A. Yes. I mean, in general, you know, you do want to align your rates with marginal
15 16 17 18 19 20 21	<ul> <li>MR. COMERFORD:</li> <li>A. Yes, that is correct.</li> <li>FITZGERALD, KC:</li> <li>Q. Right. So, was there any thought of doing some rate design prior to just doing the blunt 5.5 percent across the board average increase?</li> </ul>	15 16 17 18 19 20 21	regulatory principle of practical attributes." Could you expand on that statement a little bit piece? MR. COMERFORD: A. Yes. I mean, in general, you know, you do want to align your rates with marginal costs. There are practical attributes to
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17 careful that you're not making any changes 17 that could result from that.	er rate impacts
18 that might impact one customer adversely 18 FITZGERALD, KC:	
19 compared to some others. 19 Q. Right, but I guess the – we'r	e just going
20 FITZGERALD, KC: 20 back to first principles thoug	sh.
21 Q. Let's look at further in the same RFI at 21 Newfoundland Power says it	tself here further
22 line 22, and you're saying here that, "the 22 down in line 34, this is also y	we're talking
23 change in the wholesale rate would be 23 about, you know, the margin	al rates. It
24 relatively straightforward". Why would such 24 says, "this is also consistent	with
25 a change in the wholesale rate be relatively 25 regulatory principles of prac	tical
Page 86	Page 88
1 straightforward? 1 attributes and is consistent	with the
2 MR. COMERFORD: 2 Board's recognition of the	importance that
3 A. I would say relatively straightforward, 3 correct signals are reflecte	- 1
4 that's in terms of two utilities and their 4 customers". So, that's the	
5 professional accountants working together to 5 the guiding principle that -	– you know, is
6 establish a new utility rate. We have 6 that the Board says that the	e correct price
7 developed a framework to be able to do that 7 signals are reflected in rate	-
8 and we've outlined a regulatory process that 8 and that means that the ma	arginal rate should
9 we can achieve it. That would be a little 9 be transparent or clear?	-
10 bit different from looking at applying any 10 MR. COMERFORD:	
11 changes to Newfoundland Power's own customer 11 A. Yes, and as a matter of fac	t, I would also
12 rates, of course. 12 point out that our marginal	l tail-block
13 FITZGERALD, KC: 13 energy rate for our general	l service
14 Q. Right. We'll get to that in a second, but 14 customers are more aligne	d with the new
15 I'm just trying to understand the principles 15 utility rate based on Musk	
16 here. So, if we go down further at line 32, 16 cost than they would have	-
17 it says, "as such, any sales growth beyond 17 FITZGERALD, KC:	-
18 2023 levels would be costed at the lower 18 Q. Sorry, could you repeat the	at, what you just
19marginal rate resulting in lower overall19said?	
20 cost for customers. This is also consistent 20 MR. COMERFORD:	
21 with the regulatory principle of practical 21 A. Yeah. What I was referrin	ıg to is
22 attributes and is consistent with the 22 Newfoundland Power's ta	
23 Board's recognition of the importance that 23 general service customer r	
24 correct price signals are reflected in rates 24 declining tail-block. Histo	
25 to customers". Rates to customers I 25 the utility rate that has bee	•

1	with Holyrood, that has reflected an	1	So, while, you know, there may be some
2	inclining tail-block. So, what's	2	ability to reflect marginal energy costs in
$\begin{vmatrix} 2\\ 3 \end{vmatrix}$	effectively happening now, and with a	3	the domestic rate, there's no real ability
4	revised utility rate that we'll hopefully	4	at the moment to reflect any marginal
5	see soon enough, is that our rates are	5	capacity costs.
6	actually becoming more aligned with the	6	FITZGERALD, KC:
7	wholesale rate structure. So, our rates are	7	Q. Yeah, again, that's a technical challenge
8	well positioned to provide those marginal	8	though. The principle is the same, that
9	price signals and are better positioned than	9	they $-$ it would be $-$ the ideal would be for
10	they have been in the past.	10	them to receive the correct price signal,
11	FITZGERALD, KC:	11	correct?
12	Q. Are you just – are you referring to both	12	MR. COMERFORD:
12	classes, domestic and general service?	12	A. Yes, that is correct, yeah. And I would
13	MR. COMERFORD:	13	also say, with regards to that, that when
15	A. No, just general service, because domestic	15	you're looking at setting rates for
16	only has a flat energy rate.	16	customers, of course, we're all guided by
17	FITZGERALD, KC:	17	the Bonbright principles. There are a
18	Q. Right. So, but the same principle would	18	number of principles. Price efficiency is
19	apply to domestic service, that correct	18	one of them. Of course, you have to balance
20	price signal should be reflected in rates?	20	the issue of price efficiency with other
20	That's the principle.	20	factors as well and some of those include
$21 \\ 22$	MR. COMERFORD:	21	stability, effectiveness and those types of
$\begin{bmatrix} 22\\23 \end{bmatrix}$	A. Well, with domestic, it's a little tougher	22	things.
23	because there are no demand charges for	23 24	FITZGERALD, KC:
24	domestic customers, you know, so you're left	24	Q. Just turn to the same RFI, page 3, at line
23	Page 90	23	Page 92
	Fage 90		
1	6	1	-
$\begin{vmatrix} 1 \\ 2 \end{vmatrix}$	with whether or not you have an inclining	1	9, and here it says Newfoundland Power
2	with whether or not you have an inclining domestic rate or a declining domestic rate.	2	9, and here it says Newfoundland Power says, "a new wholesale rate would allow the
$\begin{vmatrix} 2\\ 3 \end{vmatrix}$	with whether or not you have an inclining domestic rate or a declining domestic rate. We have a flat energy rate at Newfoundland	2 3	9, and here it says Newfoundland Power says, "a new wholesale rate would allow the company to better plan its customer rate
$\begin{vmatrix} 2\\ 3\\ 4 \end{vmatrix}$	with whether or not you have an inclining domestic rate or a declining domestic rate. We have a flat energy rate at Newfoundland Power and it has been the case for some	2 3 4	9, and here it says Newfoundland Power says, "a new wholesale rate would allow the company to better plan its customer rate designs". Do you need a new wholesale rate
2 3 4 5	with whether or not you have an inclining domestic rate or a declining domestic rate. We have a flat energy rate at Newfoundland Power and it has been the case for some time. Making changes to the domestic rate	2 3 4 5	9, and here it says Newfoundland Power says, "a new wholesale rate would allow the company to better plan its customer rate designs". Do you need a new wholesale rate to design retail rates?
2 3 4 5 6	with whether or not you have an inclining domestic rate or a declining domestic rate. We have a flat energy rate at Newfoundland Power and it has been the case for some time. Making changes to the domestic rate to have it – make it a declining block rate	2 3 4 5 6	<ul> <li>9, and here it says Newfoundland Power says, "a new wholesale rate would allow the company to better plan its customer rate designs". Do you need a new wholesale rate to design retail rates?</li> <li>MR. COMERFORD:</li> </ul>
2 3 4 5 6 7	with whether or not you have an inclining domestic rate or a declining domestic rate. We have a flat energy rate at Newfoundland Power and it has been the case for some time. Making changes to the domestic rate to have it – make it a declining block rate structure, for example, is something that	2 3 4 5 6 7	<ul> <li>9, and here it says Newfoundland Power says, "a new wholesale rate would allow the company to better plan its customer rate designs". Do you need a new wholesale rate to design retail rates?</li> <li>MR. COMERFORD:</li> <li>A. It's certainly very helpful to have a</li> </ul>
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1.	Page 93		Page 95
	information available when you're designing	1	our general service tail-block energy
2	wholesale rates, you know, and that's one	2	charges, but we also have to look at our
3	aspect of it. You don't necessarily need	3	demand charges as well. Certainly on the
4	that, but it's certainly helpful and other	4	system, with regards to energy, while the
5	information to have available is certainly	5	marginal energy costs may be low, marginal
6	important as well, including indication of	6	capacity costs are very high and our demand
7	what your future embedded costs are, and	7	charges should probably be changed to
8	we're getting more certainty on that in the	8	reflect some of that as well, and that is
9	past month or so.	9	the kind of analysis and information that
10	FITZGERALD, KC:	10	comes out of a retail rate design review,
11	Q. Back to what we were talking about, the	11	which is the one that we're currently
12	first principles of price signal. Would it	12	conducting.
13	be preferrable that the tail-block energy	13	(11:00 a.m.)
14	charge and the wholesale rate reflect	14	FITZGERALD, KC:
15	marginal cost and the tail-block energy	15	Q. Could we go to PUB-NP – sorry, go to the
16	charge and the retail rate also reflect	16	original pre-filed evidence or the
17	marginal costs?	17	application itself, Table 410 in Section 4
18	MR. COMERFORD:	18	of the application. Right, okay. So, this
19	A. Well, you have to be very careful, as I had	19	is the energy supply costs, 2026
20	indicated before, about reflecting the full	20	calculation, and if in fact the tail-block
21	marginal energy costs in your customer	21	energy charge and the wholesale rate
22	rates. Right now, there is a big difference	22	reflected marginal cost and the tail-block
23	between marginal energy costs and embedded	23	energy charge and the retail rate reflected
24	costs. So, the degree at which you fully	24	marginal cost, would this variance amount
25	reflect it is something that takes careful	25	shown at Table 410 actually be closer to
1	$\mathbf{D}_{2} \approx 0.4$		
	Page 94		Page 96
1	consideration and we need to do things like	1	zero instead of the current 35?
2	consideration and we need to do things like customer impact studies basically to see if	2	zero instead of the current 35? MR. COMERFORD:
2 3	consideration and we need to do things like customer impact studies basically to see if you do drop, for example, the tail-block	2 3	zero instead of the current 35? MR. COMERFORD: A. Are you simply referring to the wholesale
$\begin{vmatrix} 2\\ 3\\ 4 \end{vmatrix}$	consideration and we need to do things like customer impact studies basically to see if you do drop, for example, the tail-block rate of a general service customer from up	2 3 4	zero instead of the current 35? MR. COMERFORD: A. Are you simply referring to the wholesale rate?
2 3 4 5	consideration and we need to do things like customer impact studies basically to see if you do drop, for example, the tail-block rate of a general service customer from up around nine cents down to four cents and	2 3 4 5	zero instead of the current 35? MR. COMERFORD: A. Are you simply referring to the wholesale rate? FITZGERALD, KC:
2 3 4 5 6	consideration and we need to do things like customer impact studies basically to see if you do drop, for example, the tail-block rate of a general service customer from up around nine cents down to four cents and then you're going to create an impact with	2 3 4 5 6	zero instead of the current 35? MR. COMERFORD: A. Are you simply referring to the wholesale rate? FITZGERALD, KC: Q. No. I'm saying if the tail-block energy
2 3 4 5 6 7	consideration and we need to do things like customer impact studies basically to see if you do drop, for example, the tail-block rate of a general service customer from up around nine cents down to four cents and then you're going to create an impact with that customer. For our general service	2 3 4 5 6 7	<ul> <li>zero instead of the current 35?</li> <li>MR. COMERFORD:</li> <li>A. Are you simply referring to the wholesale rate?</li> <li>FITZGERALD, KC:</li> <li>Q. No. I'm saying if the tail-block energy charge and the wholesale rate reflected</li> </ul>
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2 3 4 5 6 7 8 9	consideration and we need to do things like customer impact studies basically to see if you do drop, for example, the tail-block rate of a general service customer from up around nine cents down to four cents and then you're going to create an impact with that customer. For our general service customer that really isn't in the tail- block, you know, they're likely to see a	2 3 4 5 6 7 8 9	<ul> <li>zero instead of the current 35?</li> <li>MR. COMERFORD:</li> <li>A. Are you simply referring to the wholesale rate?</li> <li>FITZGERALD, KC:</li> <li>Q. No. I'm saying if the tail-block energy charge and the wholesale rate reflected marginal cost and the tail-block energy charge in retail rates reflected marginal</li> </ul>
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	D 07		<b>P</b> 00
	Page 97	1	Page 99
1	FITZGERALD, KC:	1	tail-block energy charge from ten cents down
2	Q. Okay. We'll come back to that. If we could	2	to five cents, effectively you're going to
3	go back to the RFI we were looking at, PUB-	3	have to put a higher first block energy
4	NP-004 at page 3, line 12? It says, "in	4	charge in there as well. So, some customers
5	Newfoundland Power's view, there are no	5	would certainly benefit from it because they
6	customer benefits in maintaining the current	6	may consume energy in the second block. But
7	wholesale rate beyond January 1, 2025". So,	7	other customers who consume perhaps not as
8	can you explain that?	8	much electricity in the second block, then
9	MR. COMERFORD:	9	they would likely see a rate increase. So,
10	A. Sure. The current wholesale rate, as I'm	10	this goes back to the customer rate impact
11	sure a lot of us know, is set – has a tail-	11	issue that we have when we change rates for
12	block rate set at 18 cents per kilowatt	12	retail customers versus changing rates for,
13	hour, which is very high. So, any changes	13	I guess, two utilities changing the rate
14	in energy sales effectively are costed at 18	14	that is charged from one to the other.
15	cents per kilowatt hour. So, that – you	15	CHAIR:
16	know, what we're talking about with aligning	16	Q. Excuse me, Mr. Fitzgerald, I think we'll
17	the wholesale rate to actual marginal cost	17	take our break first.
18	should diminish variances in our purchase	18	FITZGERALD, KC:
19	power costs and that should benefit	19	Q. Okay. Thank you, Mr. Chair.
$\begin{vmatrix} 1 \\ 20 \end{vmatrix}$	customers and eliminate some of the	20	(BREAK – 11:05 a.m.)
$20 \\ 21$	volatility that we've seen in recent years.	20	(RESUME - 11:31 a.m.)
$\begin{vmatrix} 21\\22 \end{vmatrix}$	FITZGERALD, KC:	22	CHAIR:
$\begin{vmatrix} 22\\23 \end{vmatrix}$	Q. Well, wouldn't there also be customer	23	Q. Any preliminary matters, Ms. Glynn?
23	benefits associated with maintaining current	23 24	MS. GLYNN:
24	retail rates beyond January 2025?	24 25	Q. No, Mr. Chair.
23	Tetali Tates beyond January 2023.	25	
	$\mathbf{p}_{} = 0 0$		D 100
1	Page 98	1	Page 100
1	MR. COMERFORD:	1	CHAIR:
2	MR. COMERFORD: A. Would there be benefits in maintaining	2	CHAIR: Q. Okay, so back to Mr. Fitzgerald.
2 3	MR. COMERFORD: A. Would there be benefits in maintaining rates?	2 3	CHAIR: Q. Okay, so back to Mr. Fitzgerald. FITZGERALD, KC:
2 3 4	<ul><li>MR. COMERFORD:</li><li>A. Would there be benefits in maintaining rates?</li><li>FITZGERALD, KC:</li></ul>	2 3 4	CHAIR: Q. Okay, so back to Mr. Fitzgerald. FITZGERALD, KC: Q. Thank you, Mr. Chair. Mr. Comerford, just
2 3 4 5	<ul> <li>MR. COMERFORD:</li> <li>A. Would there be benefits in maintaining rates?</li> <li>FITZGERALD, KC:</li> <li>Q. Without making changes to reflect the</li> </ul>	2 3 4 5	<ul> <li>CHAIR:</li> <li>Q. Okay, so back to Mr. Fitzgerald.</li> <li>FITZGERALD, KC:</li> <li>Q. Thank you, Mr. Chair. Mr. Comerford, just before moving to another topic, if we could</li> </ul>
2 3 4 5 6	<ul> <li>MR. COMERFORD:</li> <li>A. Would there be benefits in maintaining rates?</li> <li>FITZGERALD, KC:</li> <li>Q. Without making changes to reflect the marginal cost.</li> </ul>	2 3 4 5 6	<ul> <li>CHAIR:</li> <li>Q. Okay, so back to Mr. Fitzgerald.</li> <li>FITZGERALD, KC:</li> <li>Q. Thank you, Mr. Chair. Mr. Comerford, just before moving to another topic, if we could go to June 17th transcript, please, at page</li> </ul>
2 3 4 5 6 7	<ul> <li>MR. COMERFORD:</li> <li>A. Would there be benefits in maintaining rates?</li> <li>FITZGERALD, KC:</li> <li>Q. Without making changes to reflect the marginal cost.</li> <li>MR. COMERFORD:</li> </ul>	2 3 4 5 6 7	<ul> <li>CHAIR:</li> <li>Q. Okay, so back to Mr. Fitzgerald.</li> <li>FITZGERALD, KC:</li> <li>Q. Thank you, Mr. Chair. Mr. Comerford, just before moving to another topic, if we could go to June 17th transcript, please, at page 156, there's a statement here by Ms. London</li> </ul>
2 3 4 5 6 7 8	<ul> <li>MR. COMERFORD:</li> <li>A. Would there be benefits in maintaining rates?</li> <li>FITZGERALD, KC:</li> <li>Q. Without making changes to reflect the marginal cost.</li> <li>MR. COMERFORD:</li> <li>A. Yeah, there are benefits to maintaining</li> </ul>	2 3 4 5 6 7 8	<ul> <li>CHAIR:</li> <li>Q. Okay, so back to Mr. Fitzgerald.</li> <li>FITZGERALD, KC:</li> <li>Q. Thank you, Mr. Chair. Mr. Comerford, just before moving to another topic, if we could go to June 17th transcript, please, at page 156, there's a statement here by Ms. London with respect to revised wholesale rates,</li> </ul>
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June 2	27, 2024			NP 2025-2026 GRA
		Page 101		Page 103
1	Q.	So when we see the word "customers" there,	1	MR. COMERFORD:
2		that the customer is actually Newfoundland	2	A. This is the wholesale rate structure and
3		Power?	3	changing it from the 18 cents down to
4		COMERFORD:	4	marginal costs that are on the system now,
5	A.	No, I think that's referring to customers,	5	does have a lot of benefits to customers and
6		Newfoundland Powers' customers, so the	6	those benefits mean that there will be less
7		benefits of having a wholesale rate that	7	costs being passed on to customers in the
8		reflects marginal costs from Hydro is less	8	future with any changes in load growth. But
9		volatility in any annual July 1st rate	9	this has nothing to do with marginal, like
10		changes.	10	retail rates.
11		GERALD, KC:	11	FITZGERALD, KC:
12	Q.	But there's no suggested or proposed change	12	Q. Okay, so that was my question, this has
13		to the retail rate which –	13	nothing to do with retail rates, so when it
14		COMERFORD:	14	says the marginal cost that customers will
15	A.	That's correct, there's no change to the	15	pay will be reflective of the actual
16		retail rate. This, I think, was in the	16	marginal cost on the system, I didn't quite
17		context of an annual rate change that would	17	understand that, the actual cost on the
18		occur on July 1st, so when you have a Hydro	18	system when it distills down to their
19		utility rate that has 18 cent kilowatt hour	19	individual bills, there will still be a, as
20		on the tail-block and if you're experiencing	20	I say, a distortion of the retail rate. The
21		growth which means you have to purchase	21	retail rate, as you've indicated this
22		additional energy from Hydro, then that	22	morning, I believe, will not now or then
23		additional energy on the system is costing	23	reflect actual marginal costs.
24		18 cents a kilowatt hour and that has, you	24	MR. COMERFORD:
25		know, that has created rate pressure. So	25	A. Yes, as I indicated this morning, we haven't
1		Page 102	1	Page 104
1		having a utility rate that reflects the	1	made any rate adjustments to our tail-blocks
2		lower marginal costs will alleviate some of	2	as a part of this General Rate Application
3		that rate pressure as more energy is	3	for general service customers. We kept our
4	EIT7/	consumed on the system.	4	rate design stable and that is to reflect,
5		GERALD, KC:	5	you know, the fact that we are doing a rate
6	Q.	Yeah, I guess that was a difference, I	6 7	design review right now and we're looking at
7		suppose, when you say "alleviate", but this		all of those individual components, tail-
8		word that Ms. London is using is "actual	8	block charges, demand charges, basic
9 10		marginal costs on the system." I understand	9 10	customer charges, we also have to look at seasonal attributes of our retail rates, so
10		what you're saying, but there's still, there will still be a distortion, if you will, of	10	there's many factors that we have to look
11		the rate, the retail rate won't be	11	at, but no, we did not change any marginal
12		reflecting marginal costs, so customers	12	or reflect any change in marginal costs in
13		will, yes, there will be some change in the	13 14	our general service rates as a part of this
14		marginal cost because the wholesale rate is	14	GRA.
16		reflective in their bills, but it will not	16	FITZGERALD, KC:
10		bring it down to an actual reflection of a	17	Q. Or the domestic rates.
18		customer's bill; that is, when a customer	18	MR. COMERFORD:
19		gets their bill, there might be an actual	19	A. Well, yeah, similarly domestic rates and as
20		change or there might be an actual affect of	20	I indicated earlier, with domestic rates
20		the change in the wholesale rate, but it	20	it's challenging to reflect marginal costs
21		will not bring the retail rate or the entire	22	there because they have a basic customer
23		rate that they're paying within the bounds	22	charge and a flat energy charge. There's no
24		of the absolutely correct price signal,	23	demand charge component associated with
		correct?	25	domestic customers and there's no blocking
25		correct /		

	Page 105		Page 107
1	structure with domestic rates as well.	1	cost of service study and those revenue to
2	FITZGERALD, KC:	2	cost ratios were within 90 to 110 percent.
3	Q. With respect to the GRA and Newfoundland	3	We looked at all the uncertainty that was
4	Power's decision to increase each component	4	happening on the system, things that are
5	of each retail rate by 5.5 percent, were you	5	materializing now and we're getting some
6	given any direction with respect to retail	6	answers which is great, but because of that,
7	rates?	7	we made a conscious decision that we would
8	MR. COMERFORD:	8	keep our rates, rate design stable, and also
9	A. Was I given any direction? No, it certainly	9	recognizing that we are in the process of
10	would have been my recommendation that we		working with Consumer Advocate, Hydro and
11	keep things stable for our customers while	10	the Board on actual rate design review to
12	we're doing our rate design review.	12	assess these things, so, you know, we made a
12	FITZGERALD, KC:	12	pragmatic decision to keep things, rate
13		13 14	design stable for our customers while we are
14	Q. Was there any comprehensive review of the rate design prior to implementing this	14	
			undergoing our rate design review. FITZGERALD, KC:
16	initiative to raise the rates by 5.5	16	·
17	percent?	17	Q. Okay, fair enough, a pragmatic decision was
18	MR. COMERFORD:	18	made, it may turn out that if the result of
19	A. No, we're currently in the process of doing	19	the comprehensive review could possibly
20	a rate design review and that is why we	20	indicate that the decision to implement the
21	applied the 5 percent across the board on	21	5.5 percent increase across the board, was
22	those rate components.	22	not justified?
23	FITZGERALD, KC:	23	MR. COMERFORD:
24	Q. So if you're undertaking to study that, that	24	A. And that would have to follow, of course,
25	means that you don't know the answer, that	25	the completion of our rate design review.
	Page 106		Page 108
1	is Newfoundland Power doesn't know what the	1	Page 108 There's information that we're getting as a
2	is Newfoundland Power doesn't know what the effect is of a 5.5 percent increase on rates	2	Page 108 There's information that we're getting as a part of the review, such as additional load
2 3	is Newfoundland Power doesn't know what the effect is of a 5.5 percent increase on rates would be.	2 3	Page 108 There's information that we're getting as a part of the review, such as additional load research, we're having new embedded costs
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	Page 109		Page 111
1	MR. COMERFORD:	1	no real rate design changes proposed at that
2	A. So Newfoundland Power completes	2	time and rate design changes were actually
3	comprehensive rate design reviews	3	implemented in the next GRA. So right now,
4	periodically. The last one we completed was	4	like if you consider it, we had a General
5	in 2010 and that has served our rate designs		Rate Application in 2022, 2023, a settlement
6	quite well. We don't do comprehensive		agreement was for a rate design review to be
7	reviews as a part of every General Rate	6 7	commenced at that time. Here we are now in
8	Application. Comprehensive reviews are	8	the next GRA, similar to 2008 where we went
9	costly and they take time and energy, so we	9	to the 2010 GRA, when the review wasn't
10	initiated our comprehensive review following	10	fully complete, and what we're expected to
11	our last General Rate Application and we're	11	implement rates as a part of the next GRA
12	in the process of doing that, so I guess	12	that Newfoundland Power had, so the path
13	what I'm saying is that we didn't do a	13	we're on right now, effectively, is
14	comprehensive review right before we started	14	following the path that we had with our
15	a comprehensive review.	15	previous rate design review.
16	FITZGERALD, KC:	16	FITZGERALD, KC:
17	Q. Okay, well we'll leave that issue, your	17	Q. So what would you conclude, what is the
18	answer is on the record, so from your	18	timeframe?
19	experience, how long would it take to	19	MR. COMERFORD:
20	redesign the retail rates to better reflect	20	A. Our timeframe for completing our rate design
21	marginal costs?	21	review is 2026.
22	MR. COMERFORD:	22	FITZGERALD, KC:
23	A. Well, it takes, when we're redesigning our	23	Q. And that was, that's the fallout or the
24	rates, we're looking at, we need input from	24	outcome from the settlement agreement in
25	our customers, we need to do rate impact	25	2023?
	Page 110		Page 112
1	-		8
	studies, we need to look at what marginal	1	MR. COMERFORD:
2	studies, we need to look at what marginal costs we want to reflect better in our rate	$\frac{1}{2}$	MR. COMERFORD: A. As a part of our 2022, 2023 General Rate
$\begin{vmatrix} 2\\ 3 \end{vmatrix}$	costs we want to reflect better in our rate	2	A. As a part of our 2022, 2023 General Rate
3	costs we want to reflect better in our rate structures. For example, do we want to	2 3	A. As a part of our 2022, 2023 General Rate Application, that is the current timing that
3 4	costs we want to reflect better in our rate structures. For example, do we want to focus on our demand marginal costs and	2 3 4	A. As a part of our 2022, 2023 General Rate Application, that is the current timing that we're on, yes.
3 4 5	costs we want to reflect better in our rate structures. For example, do we want to focus on our demand marginal costs and increase our demand costs, look at changes	2 3 4 5	<ul> <li>As a part of our 2022, 2023 General Rate Application, that is the current timing that we're on, yes.</li> <li>FITZGERALD, KC:</li> </ul>
3 4 5 6	costs we want to reflect better in our rate structures. For example, do we want to focus on our demand marginal costs and increase our demand costs, look at changes in seasonal demand cost based on changes in	2 3 4 5 6	<ul> <li>A. As a part of our 2022, 2023 General Rate Application, that is the current timing that we're on, yes.</li> <li>FITZGERALD, KC:</li> <li>Q. And I take it that the initiative to</li> </ul>
3 4 5 6 7	costs we want to reflect better in our rate structures. For example, do we want to focus on our demand marginal costs and increase our demand costs, look at changes in seasonal demand cost based on changes in the marginal, you know, demand costs that we	2 3 4 5 6 7	<ul> <li>A. As a part of our 2022, 2023 General Rate Application, that is the current timing that we're on, yes.</li> <li>FITZGERALD, KC:</li> <li>Q. And I take it that the initiative to commence the rate design review commenced</li> </ul>
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Page 113         Page 113           1         Interpret Int	June	27, 2024		NP 2025-2026 GRA
2       PTZGFRALD, KC:       2       which was circulated with the parties in         3       Q. So the consultant's report that appeared on       3       April And I think one of the things to         4       April 1st of this year, the Christensen       4       April. And I think one of the things to         5       Report or CACFA Energy Consultants, when       5       mocisider as a part of the rate design review         6       were they engaged?       7       4       and everyone recognized in the scope of work         7       MR. COMERFORD:       10       ta were had to break up the rate design       review into two phases, and that's because         9       we didn't have all the information available       to us in order to do a comprehensive         10       Q. 2023. So several months before this General       11       quantitative review of four trates. So we         11       weight static transmark       13       phase was the report that Christensen has         15       FTZGFRALD, KC:       15       qualitative review of Newfoundland Power's         16       Q. Is there any reason why they weren't engaged       16       rates in light of changing wholesale         17       until September of 2023 to undertake this       17       rates in light of changing wholesale         18       MR. COMERFORD:       19       <		-		č
3       Q.       So the consultant's report that appeared on       April. And I think one of the things to         4       April 1st of this year, the Christensen       4         5       Report or CACEA Energy Consultants, when       5         6       were they engaged?       6         7       MR. COMERFORD:       7         8       A.       Christensen were engaged September 13th,       8         9       2023.       10       us is not ret to do a comprehensive         11       Q.       203. So several months before this General       11         13       MR. COMERFORD:       13       phase vas the report that Christensen has         14       A.       Yes that's correct.       14       provided, basically it provides a         16       Q.       Is there any reason why they weren't engaged       16       rates in light of changing wholesale         17       until September 0220 to undertake this       review?       18       review?         18       review?       18       for comments from the parties. Throughout         19       MR. COMERFORD:       20       20       sas a part of ur work towards the load       21       sas a part of ur work towards the load       21       sas a part of ur work towards the load       22       sa				· · · ·
4       April 1st of this year, the Christensen Report or CACEA Bergy Consultants, when       5         5       Report or CACEA Bergy Consultants, when       5         6       were they engaged?       6         7       MR. COMERFORD:       7         8       A. Christensen were engaged September 13th, 2023.       9       we didn't have all the information available         10       ITZERALD, KC:       10       to us in order to do a comprehensive         11       Quantitative review of our rates. So we       broke it up into two phases. The first         13       MR. COMERFORD:       13         14       A. Yes that's correct.       14         15       FITZGERALD, KC:       15         10       MR. COMERFORD:       16         21       as part of our work towards the load       17         22       research and rate design review. We filed       17         23       as part of our work towards the load       21         24       framework with the Board in December of       22         25       2022. We updated the parties in March of       25       2022. We updated ke parties, including the         23       soour load research stad, nin       7       review because we have a Phase Or verport.         24	2	FITZGERALD, KC:	2	which was circulated with the parties in
5       Report or CACEA Energy Consultants, when were they engaged?       5       process is that we, when we started upon it and everyone recognized in the scope of work that we had to break up the rate design         7       MR. COMERFORD:       7         8       A. Christensen were engaged September 13th, 2023.       9       veidin't have ald to break up the rate design         9       2023.       9       we dint't have ald to break up the rate design         10       FITZERALD, KC:       10       to us in order to do a comprehensive uu antitative review of our rates. So we broke it up into two phases. The first         13       MR. COMERFORD:       13       phase was the report that Christensen has provided, basically it provides a         14       A. Yes that's correct.       14       provided, basically it provides a         17       Is there any reason why they weren't engaged       16       rates in light of changing wholesale         18       review?       18       know, that review was provided and is out marginal costs on the system, and that, you know, thit review was provided and is out as a part of our work towards the load       21       sart, can't start until we get more         22       research and rate design review. We filed       22       certainty wift regard to updated costs and also our load research study, so we're, you know, It think right now we're in a very good       23       also our load esign to wholesale rate structure is goin	3	Q. So the consultant's report that appeared on	3	April. And I think one of the things to
5       Report or CACEA Energy Consultants, when were they engaged?       5       process is that we, when we started upon it and everyone recognized in the scope of work that we had to break up the rate design         7       MR. COMERFORD:       7         8       A. Christensen were engaged September 13th, 2023.       9       we didn't have all the information available to us in order to do a comprehensive (uantitative review of our rates. So we didn't have all the information available         10       FITZERALD, KC:       10       to us in order to do a comprehensive (uantitative review of our rates. So we dualitative review of our rates. So we provided, basically it provides a         14       A. Yes that's correct.       14       phase was the report that Christensen has provided, basically it provides a         15       FITZERALD, KC:       15       qualitative review of Newfoundland Power's retsen't light of changing wholesale         17       Is there any reason why they weren't engaged 16       16       rates in light of changing wholesale         18       review?       18       know, that review was provided and is out 14       our out expresson why they weren't engaged 23         19       MR. COMERFORD:       19       for comments from the parties. Throughout 14       the proces as well, Phase 2, we couldn't 24       research and rate design review. We filed 23       12       sea part of our work towards the load 24       13       sour load research study, so we're, you 24<	4	April 1st of this year, the Christensen	4	consider as a part of the rate design review
6       and everyone recognized in the scope of work         7       MR. COMERFORD:         9       2023.         9       2023.         9       2023.         10       FITZERALD, KC:         11       Q. 2023. So several months before this General         11       Q. 2023. So several months before this General         11       Q. 2023. So several months before this General         11       Q. MCMERFORD:         13       MR. COMERFORD:         14       A. Yes that's correct.         15       FITZGERALD, KC:         16       Q. Is there any reason why they weren't engaged         17       until September of 2023 to undertake this         18       review?         19       MR. COMERFORD:         10       MR. COMERFORD:         11       as a part of our work towards the load         12       research and rate design review. We filed         12       research and rate design review. We filed         12       research and rate design review. We filed         12       scope of work to the parties, including the         20       2022. We updated the parties, including the         21       scope of work to the parties, including the	5		5	process is that we, when we started upon it
7       MR. COMERFORD:       7       that we had to break up the rate design         8       A. Christensen were engaged September 13th,       8       review into two phases, and that's because we didn't have all the information available         10       PTZZERALD, KC:       10       to us in order to do a comprehensive quantitative review of our rates. So we barks, and that's because we didn't have all the information available         11       Q. 2023. So several months before this General       11       quantitative review of our rates. So we         13       MR. COMERFORD:       13       phase was the report that Christensen has provided, basically it provides a         15       FITZGERALD, KC:       15       qualitative review of Newfoundland Power's rates in light of changing wholesale         16       0. Is there any reason why they weren't engaged       16       rates in light of changing wholesale         17       marginal costs on the system, and that, you       20       review?       21         18       review?       18       know, that review as provided and is out       21         24       framework with the Board in December of       24       know, I think right now we're in a very good         25       2022. We updated the parties in March of       25       position when it comes to our rate design         26       2022. We updated, we provided       1	6		6	1 1
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22 very hard on both the rate design review 22 that will benefit customers into the future,		• •	<b>^</b>	Impart for and the leader of the second
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1 1 6 7	20 21 22	<ul><li>MR. COMERFORD:</li><li>A. No, I think, you know, we've been working very hard on both the rate design review</li></ul>	21 22	can do a real comprehensive thorough review that will benefit customers into the future,
6 1	20 21 22 23	<ul><li>MR. COMERFORD:</li><li>A. No, I think, you know, we've been working very hard on both the rate design review process and the load research process</li></ul>	21 22 23	can do a real comprehensive thorough review that will benefit customers into the future, I guess, as we look into the Muskrat Falls
25 provided, I guess, Christensen, as you know, 25 FITZGERALD, KC:	20 21 22 23 24	<ul> <li>MR. COMERFORD:</li> <li>A. No, I think, you know, we've been working very hard on both the rate design review process and the load research process throughout the period. What we have</li> </ul>	21 22 23 24	can do a real comprehensive thorough review that will benefit customers into the future, I guess, as we look into the Muskrat Falls era.

Page 117         Page 117           Q         And when do you expect that to land, the final?         IMR. COMERFORD:         IMR. COMERFORD:           4         A. 2026 retail rate design review is the plan completion. We also have work planed for for 2024 as well, including customer engagement.         G         ThrZGERALD, KC:           7         feedback from the parties and those types of things.         feedback from the parties and those types of things				101 2023 2020 GIGH
2       fmal?       2       A. Sorry, what was that conclusion?         3       MR. COMERFORD:       4       Q. The conclusion is that the target         5       completion. We also have work planned for completion. We also have work planned for 2024 as well, including ustomer engagement.       4       Q. The conclusion is that the target         7       feedback from the parties and those types of things.       6       Canadian average is consistent with least         7       feedback from the parties and those types of things.       8       have a 40 percent better than Canadian         9       FITZGERALD, KC:       9       average saving.       10       MR. COMERFORD:         14       MR. COMERFORD.       11       A. Was the question an 1 aware of any studies in that regard?         16       fritzGERALD, KC:       14       Q. Yeah, are you aware ofwe're looking for the completion and neares of any studies in that regard?         17       research study.       10       MR. COMERFORD:       14       Q. Yeah, are you aware of any studies in the sort of hopper or 21         14       A. It could have assisted, I would suggest.       19       FITZGERALD, KC:       10       MR. COMERFORD:         16       fritzGERALD, KC:       10       fritz deraw by Newfoundland Power nakes or was that a comber of cost benefit       25       average is consistent with least cost		Page 117		Page 119
3       MR. COMTERFORD:       3       ITTZGERALD, KC:         4       A. 2026 retail rate design review is the plan       5       Completion. We also have work planmed for         5       completion. We also have work planmed for       6       Canadian average is consistent with least         7       feedback from the parties and those types of       7       cost service? It saves consumers' money to         8       things.       8       average saving.       10         10       Q. If Newfoundland Power had implemented a       10       MR. COMERFORD:       11       A. Was the question an I aware of any studies in that regard?         13       for this rate design?       13       ITTZGERALD, KC:       14       Q. Yeah, are you aware ofwe're looking for the         14       MR. COMERFORD:       14       Q. Yeah, are you aware ofwe're looking for the       15         17       r. Grearch study.       18       THZGERALD, KC:       18       that regard.         18       FTIZGERALD, KC:       10       MR. COMERFORD:       10       A. If would have assisted, I would suggest.       20       Q. Okay, is that maybe in the sort of hopper or         12       studies undertaken by Newfoundland Power on       18       that regard.       19       FTIZGERALD, KC:       20       Q. Okay, is that maybe in				
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6       2024 as well, including customer engagement, feedback from the parties and those types of things.       6       Canadian average is consistent with least cost service? It saves consumers' money to have a 40 percent better than Canadian average saving.         9       Q. If Newfoundland Power had implemented a informed the load research that you require informed the load research is tudy.       10       RE COMERFORD:       11       A. If we had smart meters, then yes, that would informed the load research is tudy, yes.       17       A. I'r mont personally aware of any studies in that regard.         19       Q. It would have assisted our load research is tudy, yes.       18       FITZGERALD, KC:       18       FITZGERALD, KC:         24       Q. Yesterday when Mr. Chubbs was on the stand, it relay feel if is necessary to study the fact they of decision that least cost service, is that a regarmatic conclusion that is 40 percent better than Canadian average is consistent with least cost service, is that a pagmatic conclusion that is 40 percent better than Canadian average is consistent with least cost service, is that a pagmatic is consistent with least cost service, is that a regarmatine core is a transformer research as a method on 'r re		<b>č</b> 1		
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8         have a 40 percent better than Canadian           9         FTTZGERALD, KC:         9         average saving.           10         Q. If Newfoundland Power had implemented a         10         MR. COMERFORD:           11         arrange saving.         10         MR. COMERFORD:           12         in formed the load research that you require         in that regard?           13         for this rate design?         13         FTTZGERALD, KC:           14         MR. COMERFORD:         14         Q. Yeah, are you aware of any studies in           16         have probably had implications on our load         16         MR. COMERFORD:           17         research study.         17         A. I'm not personally aware of any studies in           17         research study.         18         HTZGERALD, KC:           19         Q. It would have assisted our load research         21         HT type of decision that Newfoundland Power           24         Q. Yesterday when Mr. Chubbs was on the stand.         24         that if's 40 percent better than Canadian           25         autres in deritaken by Newfoundland Power on         1         service, is that a pragmatic conclusion that           2         studies undertaken by Newfoundland Power on         1         service, is that a regared is consistent wi				
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11       smart meter program, would that have informed the load research that you require for this rate design?       11       A. Was the question am I aware of any studies in that regard?         13       for this rate design?       13       FITZGERALD, KC:         14       MR. COMERFORD:       14       Q. Yeah, are you aware ofwe're looking for the database that supports that conclusion.         16       have probably had implications on our load for research study.       16       MR. COMERFORD:         17       research study.       17       A. It could have assisted, I would suggest.       19         19       Q. It would have assisted our load research study, yes.       20       Q. Okay, is that maybe in the sort of hopper or study, yes.       21         23       FITZGERALD, KC:       23       really feel it's necessary to study the fact that it's 40 percent better than Canadian average is consistent with least cost         24       Q. Yesterday when Mr. Chubbs was on the stand, the referred to a number of cost benefit       25       average is consistent with least cost         25       he referred to a number of cost benefit       25       average is consistent with least cost         24       MR. COMERFORD:       4       without having the required studies?         3       those?       5       MR. COMERFORD:       4         4       MR. COMERFORD:       4<				e e
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Page 121         Page 123           1         that provides redundancy to the Memorial         Inversity, new load at the university to service their electric           3         FITZGERALD, KC:         3           4         Q. So it is a redundant transformer at—and it         5           5         is a substation that provides a redundant         5           7         MR. COMERFORD:         7           8         A. Yes, and I'll just like to make the point         4           9         that the university paid for all of the         9           10         costs associated with that.         10         Q. And that hasn't materialized to date.           11         FITZGERALD, KC:         11         MR. COMERFORD:         14           14         MR. COMERFORD:         14         FITZGERALD, KC:         10           15         A. The university paid a contribution for the         16         full cost of that redundant transformer,         17           16         full cost of that redundant transformer,         18         Q. Thank you. Over to Mr. Simmons.           19         Q. So do we have a percentage, a rough idea of         19         SIMMONS, KC:           20         WR. COMERFORD:         22         GREENER, KC:           21         MR. COMERFORD:				
2       University.       2       university to service their electric         3       FITZGERALD, KC:       3       boilers.         4       Q. So it is a redundant transformer at—and it       5       FTZGERALD, KC:         5       is a substation that provides a redundant       5       Q. That's the anticipated load we talked about         6       source of supply?       7       MR. COMERFORD:       7         7       MR. COMERFORD:       7       MR. COMERFORD:       1         10       costs associated with that.       10       Q. And that hasn't materialized to date.       11         11       FTZGERALD, KC:       10       Q. And that hasn't materialized to date.       11         12       Q. So MUN is paying for the redundant transformer?       14       MR. COMERFORD:       14       12       A. No, they haven't completed the project to it date.         14       MR. COMERFORD:       14       17       CHAIR:       15       Q. Okay, Mr. Chairman.       15       Q. Okay, Mr. Chairman.       16       17       CHAIR:         19       Q. So do we have a percentage, a rough idea of it may four an the value of wat their contribution mas? It wasn't a 20       Q. Thank you. Over to Mr. Simmons.       19       SIMMONS, KC:         21       Q. For the transformer?		-	1	•
3       FITZGERALD, KC:       3       boilers.         4       Q. So it is a redundant transformer at—and it       5       Dilers.         5       is a substation that provides a redundant       5       Q. That's the anticipated load we talked about         6       source of supply?       7       MR. COMERFORD:       8       A. Yes, and I'll just like to make the point       8       A. Yes, that is correct.         10       costs associated with that.       10       Q. And that has i't materialized to date.         11       FITZGERALD, KC:       11       MR. COMERFORD:       12       A. No, they haven't completed the project to         13       transformer?       13       date.       14       FITZGERALD, KC:         14       MR. COMERFORD:       14       FITZGERALD, KC:       15       Q. Okay, Mr. Chairman, those are our questions, the full cost of that redundant transformer, so, tha's sourcet.       16       Thank you.       17       CHAIR:         19       Q. So do we have a percentage, a rough idea of the redundant transformer?       18       Q. Thank you. oquestions for this witness, the source ontribution was? It wasn 't a contribution.       20       Q. Thank you. oquestions for this witness, the source ontribution are? It wasn 't actionary out to the contribution.       23       Q. Thank you. oquestions for this witness, the soureret.         2 <td></td> <td>· · ·</td> <td></td> <td></td>		· · ·		
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5       is a substation that provides a redundant source of supply?       5       Q. That's the anticipated load we talked about yesterday.         6       MR. COMERFORD:       7       MR. COMERFORD:         8       A. Yes, and I'll just like to make the point or that the university paid for all of the costs associated with that.       10       Q. And that hasn't materialized to date.         11       FITZGERALD, KC:       10       Q. And that hasn't materialized to date.         12       Q. So MUN is paying for the redundant transformer?       12       A. No, they haven't completed the project to date.         13       transformer?       12       A. No, they haven't completed the project to date.         14       MR. COMERFORD:       13       date.         15       A. The university paid a contribution for the full cost of that redundant transformer, yes, that's correct.       16       FITZGERALD, KC:         18       PTZGERALD, KC:       19       SIMMONS, KC:       20       Q. Thank you. Over to Mr. Simmons.         19       Q. So do we have a percentage, a rough idea over to M. Greene.       20       Vert MIR: IBEW is not there, so we'll move over to Ms. Greene.         25       FITZGERALD, KC:       20       Q. Thank you. Over to Ms. Greene.       21         2       FITZGERALD, KC:       20       Q. Thank uson questions.       5				
6       source of supply?       6       yesterday.         7       MR. COMERFORD:       8       A. Yes, and I'l just like to make the point that the university paid for all of the costs associated with that.       7       MR. COMERFORD:       8       A. Yes, that is correct.         10       0. So MUN is paying for the redundant transformer?       9       FITZGERALD, KC:       10       0. And that hans the materialized to date.         11       MR. COMERFORD:       13       date.       11       MR. COMERFORD:         15       A. The university paid a contribution for the full cost of that redundant transformer?       14       MR. COMERFORD:       14       FITZGERALD, KC:         17       yes, it was a full hundred percent.       17       CHAIR:       18       Q. Thank you. ore to Mr. Simmons.         19       Q. So do we have a percentage, a rough idea of eortribution.       19       SIMMONS, KC:       20       Q. Thank you. oquestions for this witness, at full hundred percent         23       A. Yes, it was a full hundred percent       23       Q. I think IBEW is not there, so we'll move over to Ms. Greene.       25         25       FITZGERALD, KC:       20       I have no questions.       5         24       correct.       5       GOMISSIONER O'BRIEN:       6       Q. I have no questions.         5 <td></td> <td></td> <td></td> <td></td>				
7       MR. COMERFORD:       7       MR. COMERFORD:         8       A. Yes, and I'll just like to make the point       9       A. Yes, that is correct.         9       that the university paid for all of the       9       FITZGERALD, KC:         11       FITZGERALD, KC:       10       Q. And that hasn't materialized to date.         13       transformer?       11       MR. COMERFORD:         14       MR. COMERFORD:       13       date.         15       A. The university paid a contribution for the       16       full cost of that redundant transformer,         16       full cost of that redundant transformer,       14       FITZGERALD, KC:         18       FITZGERALD, KC:       18       Q. Thank you. Over to Mr. Simmons.         19       Q. So do we have a percentage, a rough idea of       19       SIMMONS, KC:         20       Q. Thank you, no questions for this witness,       20       Q. Thank you, no questions for this witness,         21       MR. COMERFORD:       22       Q. I think IBEW is not there, so we'll move         23       A. Yes, it was a full hundred percent       23       Q. I have no questions, Mr. Chairman.         24       cortext       25       GREENE, KC:       Page 124         1       Q. I have no questions, Mr.	5	-		-
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11       FITZGERALD, KC:       11       MR. COMERFORD:         12       Q. So MUN is paying for the redundant       13       date.         14       MR. COMERFORD:       14       FITZGERALD, KC:         15       A. The university paid a contribution for the       15       Q. Okay, Mr. Chairman, those are our questions,         16       full cost of that redundant transformer,       16       thank you.       Oway, Mr. Chairman, those are our questions,         17       yes, that's correct.       17       CHAIR:       18       FITZGERALD, KC:       18       Q. Thank you. Over to Mr. Simmons.         19       Q. So do we have a percentage, a rough idea of       19       SIMMONS, KC:       20       W. Thank you, or questions for this witness,         20       what their contribution was? It wasn't a       20       Q. Thank you, or questions for this witness,         21       hundred percent.       21       Mr. COMERFORD:       22       CHAIR:         23       A. Yes, it was a full hundred percent       23       G. I have no questions, Mr. Chairman.       24         25       FITZGERALD, KC:       25       GREENE, KC:       Page 124         4       Q. I have no questions.       5       COMMISSIONER O'BRIEN:       6       Q. I have no questions.       5 <t< td=""><td></td><td></td><td></td><td></td></t<>				
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13       transformer?       13       date.       14         14       MR. COMERFORD:       14       FITZGERALD, KC:         15       A.       The university paid a contribution for the full cost of that redundant transformer, yes, that's correct.       17       CHAIR:         18       FITZGERALD, KC:       18       Q.       Nank you.       Over to Mr. Simmons.         19       Q.       So do we have a percentage, a rough idea of undered percent.       19       SIMMONS, KC:         20       what their contribution was? It wasn't a lundred percent.       19       SIMMONS, KC:         21       hundred percent.       20       C HAIR:       20         23       A.       Yes, it was a full hundred percent       23       Q.       Thank you, no questions for this witness, over to Ms. Greene.         25       FITZGERALD, KC:       20       Q.       Ithink IBEW is not there, so we'll move over to Ms. Greene.       24         26       RECOMERFORD:       21       Q.       I have no questions, Mr. Chairman.         27       MR. COMERFORD:       21       Q.       I have no questions.       17         3       A.       Paid for the transformer, yes, that is correct.       25       GREENE, KC:       26       COMMISISIONER O'BRIEN:       6       <	1	FITZGERALD, KC:		MR. COMERFORD:
14       MR. COMERFORD:       14       FITZGERALD, KC:         15       A. The university paid a contribution for the       15       Q. Okay, Mr. Chairman, those are our questions, thank you.         17       yes, that's correct.       17       CHAIR:         18       FITZGERALD, KC:       18       Q. Thank you. Over to Mr. Simmons.         19       Q. So do we have a percentage, a rough idea of       19       SIMMONS, KC:         20       what their contribution was? It wasn't a hundred percent.       10       Mr. Chairman.         21       MR. COMERFORD:       22       CHAIR:         23       A. Yes, it was a full hundred percent contribution.       23       Q. Thank you, no questions for this witness, over'll move over to Ms. Greene.         25       FITZGERALD, KC:       25       GREENE, KC:         7       Page 122       1       Q. I have no questions, Mr. Chairman.         2       MR. COMERFORD:       2       1         3       A. Paid for the transformer, yes, that is or the substation back in 2020, I think it was?       3       VICE-CHAIR NEWMAN:         4       correct.       5       GOMINSIONER O'BIEN:       6       Q. No questions.         7       Memorial for the 4.6 million that was spert 8       0       No the substation back in 2020, I think it wa	12			A. No, they haven't completed the project to
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20       what their contribution was? It wasn't a       20       Q.       Thank you, no questions for this witness,         21       hundred percent.       21       MR. COMERFORD:       22       CHAIR:         23       A.       Yes, it was a full hundred percent       23       Q.       Think JBEW is not there, so we'll move         24       contribution.       23       Q.       Think IBEW is not there, so we'll move         24       contribution.       24       Out think IBEW is not there, so we'll move         24       contribution.       24       Out think IBEW is not there, so we'll move         24       contribution.       24       Out there, so we'll move         25       GREENE, KC:       Page 124         1       Q.       I have no questions.       Page 124         2       MR. COMERFORD:       2       CHAIR:         3       A.       Paid for the transformer, yes, that is       3       VICE-CHAIR NEWMAN:         4       Q.       Does Newfoundland Power intend to refund       Memorial for the 4.6 million that was spent       7         6       Q.       Does Newfoundland Power intend to refund       8       Q.       I have one. It was just about the         9       transformer and the expansion of the Lond	18	FITZGERALD, KC:	18	Q. Thank you. Over to Mr. Simmons.
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1	CHAIR:	1 think we can adjourn for the day.
2	Q. Because I know there's a lot of discussion	2 CHAIR:
3	about, there's the redundant supply, but if	3 Q. I will adjourn for today. See you tomorrow
4	this additional load had been supplied at	4 thank you.
5	the other MUN substation, you still would	5 Upon concluding at 12:01 p.m.
6	have charged no contribution because it	6
7	would have been supported by load growth, is	7
8	that fair?	8
9	MR. COMERFORD:	9
10	A. Yes, that is correct. That additional load	10
11	is supported by load growth.	11
12	CHAIR:	12
13	Q. Okay, that's all my questions. Thank you.	13
14	MR. O'BRIEN:	14
15	Q. I have nothing arising. Nothing arising,	15
16	Mr. Chair.	16
17	MS. GLYNN:	17
18	Q. Well Mr. Chair, I'm surprised that we're	18
19	finished with Mr. Comerford and I think I	19
20	indicated that yesterday that I thought we	20
21	would be most of the day with Mr. Comerford.	21
22	We do have another witness, Mr. Bowman, I	22
23	think we had agreed that we would wait until	23
24	Friday. My only concern is that we would	24
25	want to make sure that we get through Mr.	25
	Page 126	Page 128
1	Bowman tomorrow, so I don't know if any of	CERTIFICATE
2	the parties –	
3	MR. O'BRIEN:	I, Judy Moss, hereby certify that the foregoing is a
4	Q. I can't imagine I'm going to be more than an	true and correct transcript of hearing in the matter
5	hour with Mr. Bowman.	of Newfoundland Power Inc. 2025-2026 General Rate
6	MS. GLYNN:	Application heard on June 27th, 2024 before the
7	Q. So we should have sufficient time.	Newfoundland and Labrador Board of Commissioners of
8	MR. O'BRIEN:	Public Utilities, 120 Torbay Road, St. John's,
9	Q. I don't know how long your direct is going	Newfoundland and Labrador and was transcribed by me to
10	to be, any idea?	the best of my ability by means of a sound apparatus.
11	BROWNE, KC:	
12	Q. Within an hour for sure.	Dated at St. John's, Newfoundland and Labrador this
13	MR. O'BRIEN:	27th day of June, 2024
14	Q. We should be fine with Mr. Bowman tomorrow.	
15	GREENE, KC:	
16	Q. And Hydro?	Judy Moss
17	MS. GLYNN:	
18	Q. Hydro, do you have –	
19	SIMMONS, KC:	
20	Q. We don't anticipate being very long at all,	
21	if anything.	
22	MS. GLYNN:	
23	Q. So it certainly seems as if we should be	
24 25	able to get through Mr. Bowman's testimony tomorrow and if that's the case, then I	

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