

Page 1

1 (9:01 a.m.)  
 2 CHAIR:  
 3 Q. Good morning everyone. Any preliminary  
 4 matters, Ms. Glynn?  
 5 MS. GLYNN:  
 6 Q. I do believe that the Consumer Advocate  
 7 wants to raise an issue.  
 8 BROWNE, KC:  
 9 Q. Yes, Mr. Chair, the issue of final  
 10 submissions and the dates for those in the  
 11 process, we need those ASAP because we have  
 12 to plan accordingly.  
 13 CHAIR:  
 14 Q. Yes, we were discussing it yesterday and I  
 15 think there will be further discussions  
 16 later today, so we're working on coming up  
 17 with a plan for that as soon as we can,  
 18 thanks.  
 19 MS. GLYNN:  
 20 Q. One of the inputs always would be when the  
 21 hearing actually ends as well, so I think  
 22 we're all hoping that we might be finished  
 23 this week. We could easily go into next  
 24 week as well, so you know, knowing when the  
 25 hearing date will end, getting that public

Page 2

1 participation date in as well, always is an  
 2 input into our submission date.  
 3 CHAIR:  
 4 Q. And so I think it's back to Ms. Greene for  
 5 questioning.  
 6 GREENE, KC:  
 7 Q. Yes, thank you, Mr. Chair. Good morning,  
 8 Mr. Chubbs.  
 9 MR. CHUBBS:  
 10 A. Good morning.  
 11 GREENE, KC:  
 12 Q. When we finished yesterday we were talking  
 13 about reliability and how you measure and  
 14 evaluate your performance. Today I wanted  
 15 to talk briefly about how you set targets  
 16 for reliability, so here I would like to go  
 17 to PUB-NP-009, Attachment A. Earlier in  
 18 the hearing we heard that what is shown here  
 19 as corporate performance measures are the  
 20 measures that go into the STI plan at  
 21 Newfoundland Power for the executives and  
 22 the directors. And here we see that there  
 23 is a target for reliability, which is one of  
 24 your key metrics that you use to set  
 25 targets, is that correct?

Page 3

1 MR. CHUBBS:  
 2 A. Yes, that's correct.  
 3 GREENE, KC:  
 4 Q. And when I looked at what the targets were  
 5 and I assume the target is the plan, is that  
 6 correct? For example, in 2020 we see 2.37  
 7 outage hours per customer.  
 8 MR. CHUBBS:  
 9 A. Yes, that's correct.  
 10 GREENE, KC:  
 11 Q. And if we come across, we see that in 2021,  
 12 2.5; 2022, 2.55; and 2023, 2.69. So there  
 13 is a slight deterioration in the target each  
 14 year. In 2024 we see the same target as in  
 15 2023, which is the only outlier here, I  
 16 would call it. In talking about this, Mr.  
 17 Murray explained that in setting the targets  
 18 you use a five-year historical average, is  
 19 that correct?  
 20 MR. CHUBBS:  
 21 A. Yes, that's correct.  
 22 GREENE, KC:  
 23 Q. So the question that I have is if you take  
 24 the actual historical average and your  
 25 performance has been deteriorating, that

Page 4

1 makes your target easier to achieve, it  
 2 becomes lower in the subsequent year because  
 3 you're using lower data from the previous  
 4 year?  
 5 MR. CHUBBS:  
 6 A. I don't know if I could characterize it as  
 7 easier, you know, the target that we set is  
 8 based on our most recent five-year  
 9 experience, so that could be influenced by a  
 10 number of things, such as, you know, the age  
 11 of your system, so we have an aging system.  
 12 We are seeing an increasing number of  
 13 equipment failures that, you know, appear to  
 14 be related to that. It can be influenced by  
 15 the weather that we experience and although  
 16 we exclude major events and there's a  
 17 threshold that's considered a major event.  
 18 There's still many stormy days that fall  
 19 within what we characterize as normal  
 20 operating conditions, so that can influence  
 21 the target as well. So, you know, as the  
 22 system ages, as we're seeing more frequent  
 23 storms, the target may fluctuate with that,  
 24 but I certainly wouldn't characterize it as  
 25 getting easier to meet because of those

Page 5

1 external conditions.  
 2 GREENE, KC:  
 3 Q. But you do agree that target is getting  
 4 lower to achieve.  
 5 MR. CHUBBS:  
 6 A. The five-year average has increased in the  
 7 last few years, yes.  
 8 GREENE, KC:  
 9 Q. Yes, and that is what is a measure for one  
 10 of the metrics in your corporate performance  
 11 which is influencing your short-term  
 12 incentive payments, is that correct?  
 13 MR. CHUBBS:  
 14 A. Yes, that's correct.  
 15 GREENE, KC:  
 16 Q. Can you explain why it is the same in 2024  
 17 as in 2023?  
 18 MR. CHUBBS:  
 19 A. That would just be a matter of the  
 20 calculation, the average for the last five  
 21 years happened to be the same as the average  
 22 for the previous five years, so it was the  
 23 same methodology used, the output just  
 24 turned out to be the same number for this  
 25 year.

Page 6

1 GREENE, KC:  
 2 Q. And while we're on this chart, if we can  
 3 look at the cost, regulated operating cost  
 4 per customer, another one of the metrics  
 5 that is used in your corporate performance  
 6 metrics. And here again we see the same  
 7 thing, that each year the cost per customer  
 8 has increased to 38 in 2020, to 41 in '21,  
 9 to 44 in '22, 2023 is 265 and 2024 is 270,  
 10 and Mr. Simmons took you to the chart  
 11 yesterday which showed on an inflation  
 12 adjusted basis your trend in operating cost  
 13 has been up since your last general rate  
 14 application, is that correct?  
 15 MR. CHUBBS:  
 16 A. Yes, that's correct.  
 17 GREENE, KC:  
 18 Q. And here we see this is not inflation  
 19 adjusted, but we see the similar trend here  
 20 back to 2020 that your operating costs are  
 21 trending up, they may have been trending  
 22 down in the first period you showed on the  
 23 10-year chart, but now they're trending up,  
 24 is that correct?  
 25 MR. CHUBBS:

Page 7

1 A. Yes, that's correct.  
 2 GREENE, KC:  
 3 Q. And again we see that each year your target  
 4 for the subsequent year increases because  
 5 you didn't meet your target the year before.  
 6 MR. CHUBBS:  
 7 A. Yes, that's correct.  
 8 GREENE, KC:  
 9 Q. So the question is what is the incentive for  
 10 Newfoundland Power to continue at the same  
 11 level of reliability or control of operating  
 12 costs if your incentive payments reflect  
 13 lower achievement in previous years?  
 14 MR. CHUBBS:  
 15 A. So as I mentioned in terms of our  
 16 reliability, you know, we use the most  
 17 recent five-year average. When I look at  
 18 that target, there's really, it is a short-  
 19 term incentive, it is based on your  
 20 performance for that year and it's really a  
 21 target to achieve three key things in our  
 22 operations. You know, the completion of  
 23 your plan maintenance work, your response to  
 24 storms and system events, and your planned  
 25 outages. So we have planned outages as part

Page 8

1 of our normal work operations, we do our  
 2 best to plan the work to minimize the impact  
 3 on customers, so over the short term, over a  
 4 course of a year, this target provides a  
 5 strong incentive for management of the  
 6 company to, you know, complete all that work  
 7 and minimize the impact on customers.  
 8 There's a band there and the band on that  
 9 reflects the variability that we can see  
 10 from one year to the next that's a result of  
 11 the type of storm, the type of year that  
 12 we've had in terms of weather, right. I  
 13 mentioned in my opening statement that in  
 14 over the last 10 years or so, our customers  
 15 have experienced between 2.2 and 3 hours of  
 16 outage time and some of the graphs that  
 17 we've displayed show that variation up and  
 18 down so we can have those kind of swings.  
 19 You can start out a year, for example, and  
 20 have a lot of poor weather and you can  
 21 really get behind in your target, but the  
 22 band keeps that incentive there to still  
 23 continue to get your maintenance work done,  
 24 still continue to minimize planned outages  
 25 where you can for customers, and try to be

Page 9

1 as effective and efficient and quick in your  
 2 response to customer outages and storms and  
 3 things when they occur. So I think the  
 4 incentive works well over the course of a  
 5 year in incenting reliability performance.  
 6 Operating costs, you know, what's going on  
 7 there in operating costs is really a  
 8 reflection of what we've been seeing over  
 9 the last few years in terms of inflation, so  
 10 it comes back to our, again, back to my  
 11 original opening statement. When you look  
 12 back at, say 2020, for example, and we're  
 13 forecasting where operating costs are going  
 14 to go, we're using GDP, you know, for  
 15 inflation and what we forecast at that time  
 16 was not what we experienced. So we're  
 17 forecasting, you know, GDP of two or three  
 18 percent a year and then through the years,  
 19 '21, '22 or '23, we're seeing more like 7, 8  
 20 percent, right? So that's the result of  
 21 costs that are largely outside of  
 22 Newfoundland Power's control, things that  
 23 happen in the market in terms of insurance  
 24 and technology costs and things like that.  
 25 So they've made that target very challenging

Page 10

1 over the last couple of years, and as a  
 2 result, we haven't met that target and the  
 3 management team has not been compensated for  
 4 that.  
 5 GREENE, KC:  
 6 Q. And if we go back and I don't think we need  
 7 to, to look at Figure 2.6 SAIDI and the  
 8 figure that Mr. Simmons took you to in NP-  
 9 011, NP PUB, we see the trend has been down  
 10 for both reliability, if you look at Figure  
 11 2.6 your number of hours of outage are going  
 12 up since 2018 and similarly your costs are  
 13 going up, so the trend is up since your last  
 14 GRA; down for reliability and up for costs.  
 15 MR. CHUBBS:  
 16 A. Yeah, they tend to vary and it takes one  
 17 good year, one bad year, I think to, you can  
 18 sway that five-year average. You know, this  
 19 year we're actually having a very good year,  
 20 so hopefully, you know, if we have a good  
 21 fall, it could be down again, right and  
 22 that's that variability that we can see year  
 23 over year in terms of weather impacting it,  
 24 right, so there's a natural range that  
 25 you're going to see in terms of reliability

Page 11

1 outcomes.  
 2 GREENE, KC:  
 3 Q. You mentioned extreme weather as one of your  
 4 challenges and one of the challenges in  
 5 operations, as well as in control of your  
 6 costs. Is Newfoundland Power adjusting its  
 7 operations to take into account more extreme  
 8 weather events?  
 9 MR. CHUBBS:  
 10 A. Yes, we are.  
 11 GREENE, KC:  
 12 Q. PUB NP-056, that's what I think you're  
 13 looking for.  
 14 MR. CHUBBS:  
 15 A. You know where I'm going?  
 16 GREENE, KC:  
 17 Q. I think so.  
 18 MR. CHUBBS:  
 19 A. You were right.  
 20 GREENE, KC:  
 21 Q. It's just you've mentioned it as one of the  
 22 challenges for your costs and for your  
 23 reliability and the obvious question is how  
 24 are you preparing to respond to it for the  
 25 future so we don't see it continue a decline

Page 12

1 in trend?  
 2 (9:15 a.m.)  
 3 MR. CHUBBS:  
 4 A. No, absolutely and it's an important  
 5 question and I think it is covered fairly  
 6 well in PUB-NP-056. There's two components  
 7 to, when we think about extreme weather.  
 8 The first is I'll say overall reliability,  
 9 right, so that's the ability of your system  
 10 to withstand extreme weather conditions and  
 11 hold up against things that are outside of  
 12 the design parameters of a transmission or a  
 13 distribution line or a substation. We build  
 14 to Canadian standards that are tailored for  
 15 Newfoundland. We have one of the most  
 16 severe weather loading conditions in  
 17 Newfoundland, compared to other provinces  
 18 and that's actually recognized in the CSA  
 19 Standards, so we build to that and I think  
 20 it's important to note that we've been  
 21 building to that standard for over 20 years  
 22 now. So that strengthens our system over  
 23 time. It's a standard, so when it's  
 24 introduced, you don't immediately, your  
 25 system isn't immediately brought up to

<p style="text-align: right;">Page 13</p> <p>1 standard fully, you just start building to                  2 that standard going forward, so when I look                  3 at over the last 20 years, I'd say about 30                  4 percent of our system has been rebuilt to                  5 that standard and that has helped us                  6 withstand some extreme weather conditions.                  7 You know, our capital program is the other                  8 big component of it, right, and preventative                  9 maintenance and corrective maintenance                  10 projects and programs in our capital budget.                  11 We've incorporated other things, like flood                  12 zones, coastal erosion risk areas into our                  13 line designs, so as our engineers and                  14 technologists are designing lines,                  15 transmission lines distribution lines,                  16 they're taking these things into account so                  17 that 50 or 100 year flood zone doesn't get                  18 major flooding, you're minimizing the impact                  19 on your lines. Coastal erosion, we saw that                  20 very real with Hurricane Fiona on the west                  21 coast in Port aux Basques, right. I think we                  22 saw the impacts of potential for coastal                  23 erosion on our infrastructure. And the                  24 other piece of it is resiliency and that is                  25 probably the larger focus of utilities when</p>	<p style="text-align: right;">Page 15</p> <p>1 improved our operational response when it                  2 comes to major storms and events, so our new                  3 outage management system that we implemented                  4 in 2019 has predicted systems I was talking                  5 about yesterday, has really been a game                  6 changer for Newfoundland Power in terms of                  7 understanding the conditions on the system                  8 when we have major outages. Our GIS system,                  9 so everything is mapped, all of our crew                  10 location, our trucks have vehicle tracking                  11 so we can get the nearest truck to the                  12 outage as quick as we can to improve that                  13 response. Our workforce management system                  14 so we can electronically dispatch work to                  15 laptops in the trucks, rather than trying to                  16 get paper work orders out like we used to in                  17 the past. And then the system automation                  18 that we put in place, so we have a lot of                  19 remote control capabilities in our                  20 substations and on our distribution lines                  21 that minimize the impact of the outage and                  22 allow our crews to focus on restoring power                  23 so they're not searching for where the                  24 trouble is on the system.                  25 GREENE, KC:</p>
<p style="text-align: right;">Page 14</p> <p>1 it comes to climate adaptation, and that's                  2 the ability to bounce back, right, so                  3 everyone is getting hit with storms and                  4 everyone is having these outages, how well                  5 does your system and your response get power                  6 back to customers, how quickly? And we've                  7 done a lot of work in that area. We have a                  8 lot of, you know, upfront checklists                  9 preparing for storms, we have, we run                  10 through tabletop exercises, we do—we have                  11 organizational charts that are separate for                  12 storms, right, and responsibilities that we                  13 put into place if we get into a major storm.                  14 Customer communications plans in place for                  15 these major events, you know, strong                  16 relationships with Newfoundland and Labrador                  17 Hydro, Emergency Management, EMS in the                  18 province on municipalities, as well. We                  19 have mutual assistance agreements in place                  20 with other utilities so we can bring                  21 resources in, if necessary, and vice versa                  22 if we need to send resources elsewhere. And                  23 technology has been a big piece of that for                  24 us, so we've implemented a lot of technology                  25 over the last decade that has really</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. A number of the initiatives you outlined                  2 were designed specifically to respond to                  3 climate change, were they? They were                  4 general operating practices of Newfoundland                  5 Power?                  6 MR. CHUBBS:                  7 A. They certainly support –                  8 GREENE, KC:                  9 Q. They could support –                  10 MR. CHUBBS:                  11 A. - the response, absolutely and they've been                  12 very effective for Newfoundland Power over                  13 the last few years as we've been dealing                  14 with, you know, some significant events like                  15 Snowmageddon or Hurricane Larry or Fiona,                  16 they've absolutely been impactful for us.                  17 GREENE, KC:                  18 Q. Some of the other utilities, such as                  19 Maritime Electric have developed a specific                  20 strategy for dealing with climate change                  21 adoption, has Newfoundland Power considered                  22 developing a similar strategy?                  23 MR. CHUBBS:                  24 A. Yes, we have. So similar to Maritime                  25 Electric we've done climate change risk</p>

Page 17

1 assessments on our infrastructure, so we've  
 2 looked across how other utilities and  
 3 organizations are approaching it and you  
 4 really want to understand the risk of  
 5 climate change and how it can affect your  
 6 utility and your operations. For  
 7 Newfoundland, you know, wind and ice loading  
 8 clearly is a risk for our operations in  
 9 terms of reliability. Coastal erosion, as I  
 10 mentioned, which I would say early on was  
 11 probably on the lower end, you know, we live  
 12 on a rock, right, so you don't expect  
 13 coastal erosion to be as impactful here as  
 14 it would be, say in PEI, but we saw the  
 15 impacts of that in Fiona on the Westcoast.  
 16 But we've done that risk assessment and are  
 17 putting in place action items to address  
 18 that. I mentioned flooding, for example, so  
 19 we've incorporated flood zones into our line  
 20 designs. We've added layers, so we know  
 21 take data from the provincial government for  
 22 wildfires, right, so everyone, you know,  
 23 we've all been watching what's happening in  
 24 Churchill Falls the last few days. We've  
 25 added this to our Geographical Information

Page 18

1 System, our GIS system, so that if a  
 2 wildfire were to occur in our territory, we  
 3 can look at that layer and understand what  
 4 infrastructure we have near it and be able  
 5 to respond.  
 6 GREENE, KC:  
 7 Q. You've talked about a number of different  
 8 initiatives, do you plan to bring together  
 9 in one overall strategy where customers can  
 10 see how prepared Newfoundland Power is to  
 11 respond to these types of events?  
 12 MR. CHUBBS:  
 13 A. I think that's something that is worth  
 14 considering, you know, how we present that  
 15 to customers. I know we have a lot in place  
 16 internally and we do communicate with our  
 17 customers when we have severe weather and  
 18 system events to help customers understand  
 19 what we're doing, but I can't say that we've  
 20 put anything out there that kind of outlines  
 21 the strategy and what we're doing as an  
 22 upfront –  
 23 GREENE, KC:  
 24 Q. Similar to what, for example, Maritime  
 25 Electric has done recently.

Page 19

1 MR. CHUBBS:  
 2 A. Yeah, yeah.  
 3 GREENE, KC:  
 4 Q. Another topic like that, before we move on  
 5 to operating costs, is electrification and  
 6 again you mentioned it earlier as one of the  
 7 challenges that is facing all utilities,  
 8 what the impact of the grid will be of  
 9 increasing customer demand because of the  
 10 switch to electrification. Again, how is  
 11 Newfoundland Power planning to address the  
 12 impact of electrification growth on your  
 13 system?  
 14 MR. CHUBBS:  
 15 A. So we've got a number of initiatives  
 16 happening around electrification at  
 17 Newfoundland Power. In terms of our capital  
 18 program, and I know this was a question for  
 19 Mr. Murray on how we had incorporated  
 20 electrification into our capital planning,  
 21 so that happens in a few, in a couple of  
 22 ways. You know, electrification is built  
 23 into our load forecast, so home heating  
 24 conversions, electric vehicle adoption, that  
 25 forms part of our customer load forecast and

Page 20

1 that gets incorporated into our capital  
 2 planning every year as part of our  
 3 substation power transformer and  
 4 distribution feeder load forecast, so we  
 5 take the forecast growth and we allocate  
 6 that across the electricity system in areas  
 7 where we know growth is occurring, you know,  
 8 more, so we weight it, in some areas versus  
 9 others based on known growth areas, and that  
 10 highlights if any of our lines are reaching  
 11 capacity and if our power transformers are  
 12 starting to reach capacity and whether we  
 13 need to do upgrades there to address that.  
 14 So when I look at our capital budget, we've  
 15 got two projects in the latter years of our  
 16 five-year plan, one in Kelligrews and one in  
 17 Hardwoods substation to add power  
 18 transformer capacity there. It's not  
 19 directly related to electrification or  
 20 electrical vehicles, it's related to general  
 21 load growth, but electric vehicle growth is  
 22 in amongst that, so it's part of it, and  
 23 we've got about 11 million dollars  
 24 identified in specific distribution upgrades  
 25 over the next five years in areas where we

Page 21

1 see the system is starting to reach  
 2 capacity. One of the different things about  
 3 electrification, for us, is it's a different  
 4 type of growth for Newfoundland Power. It's  
 5 a type of growth we haven't really  
 6 experienced to this degree, so when I think  
 7 historically of load growth at Newfoundland  
 8 Power, it's been about new customer  
 9 connections, you know, new subdivisions, new  
 10 homes. We know exactly when the customer is  
 11 building the house, they're contacting us  
 12 and we know the cost to run a line to that  
 13 house, install a meter and that's normal  
 14 routine operation at Newfoundland Power.  
 15 What we're seeing with electrification is  
 16 this is additional growth in existing areas,  
 17 so we think of a home or a neighbourhood  
 18 that's been built for 40 years, you know,  
 19 and the infrastructure has been there for 40  
 20 years and the capacity has been sufficient  
 21 for 40 years and then, you know, an electric  
 22 vehicle is purchased by a home and then up  
 23 the street another electric vehicle and  
 24 eventually you get to a point where, okay,  
 25 now the power transformer is at capacity or

Page 22

1 maybe that customer needs a service upgrade  
 2 or eventually the main line feeding into the  
 3 area would need an upgrade, in areas that  
 4 are already existing, and the challenge with  
 5 that, one challenge with that is, you know,  
 6 customers aren't telling us they're buying  
 7 electric vehicles, right, so we have to do a  
 8 different type of analysis on the system to  
 9 understand where that growth is occurring so  
 10 we can deal with it before it causes any  
 11 issues on our system. So we've started to  
 12 do that, review it every year, we're looking  
 13 at our system now and looking at  
 14 distribution transformers and our  
 15 distribution lines and trying to understand  
 16 areas where we're seeing new pockets of new  
 17 types of growth and getting out ahead of  
 18 that. We done a calculation, we estimate  
 19 that it's about \$500.00 per EV in  
 20 distribution upgrades at the service level  
 21 for customers. Now every, you know, there's  
 22 many EVs now, a customer buys it, you know,  
 23 they might put in a charger, but it doesn't  
 24 affect their service. There's other  
 25 customers who would need a service grade

Page 23

1 because maybe they're maxed out, and then  
 2 there's other times where it might not  
 3 affect, you know, four customers on the same  
 4 transformer, but once you put that  
 5 altogether, the transformer needs an  
 6 upgrade, you know. So the average that we  
 7 estimate was around 500, so what we do is we  
 8 take the electric vehicle forecast, the  
 9 latest information we have on EVs, and we  
 10 essentially multiply that by \$500.00, you  
 11 know, based on the given year and we built  
 12 that in as a separate line in our capital  
 13 plan to address electrification growth  
 14 across our service territory.  
 15 GREENE, KC:  
 16 Q. And what about oil to electricity  
 17 conversion, how are you tracking that and  
 18 reflecting that in your plans?  
 19 MR. CHUBBS:  
 20 A. So that would be similar to what I mentioned  
 21 upfront, like that's built into our load  
 22 forecast. You know, it's not to the same  
 23 degree as electric vehicles will potentially  
 24 be, right, so it's not causing any other  
 25 issues or concerns for us, other than

Page 24

1 general growth that we can address through  
 2 our normal planning processes, and you know,  
 3 I think the plan right now, for the  
 4 provincial government plan is 10,000 of  
 5 these conversions; whereas, when we look at  
 6 EVs, you know, there's 400,000 vehicles on  
 7 the road in Newfoundland and Labrador, so  
 8 that's a much larger scale, so the adoption  
 9 rate is not to the point yet where it's of  
 10 major concern for us, but we're trying to do  
 11 the things now and plan now for when that  
 12 time comes. And I have a longer list, but  
 13 I'll stop there.  
 14 GREENE, KC:  
 15 Q. So as I understand your answer and as  
 16 reflected in PUB-NP-052, which we don't need  
 17 to go through, you do have in your five-year  
 18 plan some load growth additions, like  
 19 additional transformers, whether it's for  
 20 electrification or for any other reason for  
 21 load growth, such as immigration which we've  
 22 heard recently is increasing, is that  
 23 correct?  
 24 MR. CHUBBS:  
 25 A. Yes, that's correct.

Page 25

1 GREENE, KC:  
 2 Q. And we also understand from PUB-NP-053 that  
 3 beyond the five-year plan and planning for  
 4 load growth for electrification and other  
 5 purposes, Newfoundland Power is not  
 6 specifically addressing how electrification  
 7 will affect its operations, is that correct?  
 8 (9:30 a.m.)  
 9 MR. CHUBBS:  
 10 A. Yes, that's generally correct. I would say  
 11 that things that we're doing right now are  
 12 preparing us for what's coming beyond the  
 13 five-year plan, and I'll point out that, you  
 14 know, our five-year plan is a rolling five  
 15 years, so we updated that every year, so  
 16 we've always got that five-year outlook.  
 17 GREENE, KC:  
 18 Q. And the last topic before we get to costs is  
 19 the asset management review. Here I would  
 20 like to go to PUB-NP-050. And here you had  
 21 given us an update on where Newfoundland  
 22 Power was with the ongoing asset management  
 23 review. Is there any change to this status  
 24 since this RFI was filed?  
 25 MR. CHUBBS:

Page 26

1 A. No, I don't believe so.  
 2 GREENE, KC:  
 3 Q. And you indicated earlier, yesterday, that  
 4 you see this as an ongoing process with a  
 5 length implementation period, in fact, I  
 6 think the answer says up to 7 years, is that  
 7 correct?  
 8 MR. CHUBBS:  
 9 A. You know, I think 7 years was an example  
 10 that I provided and as I mentioned  
 11 yesterday, I don't really see an endpoint  
 12 for this and I think as we've educated  
 13 ourselves on this ISO 55000 asset management  
 14 standard, it's not really a set of asset  
 15 management practices, it's more of an  
 16 approach or methodology to asset management,  
 17 like it starts at the highest level of an  
 18 asset management strategy and then a  
 19 development of strategy, specific strategies  
 20 for assets across the organization. Like  
 21 any ISO standard, you know, it's big on  
 22 documentation, that you have your  
 23 documentation in place and that you act upon  
 24 that documentation. And it's really focused  
 25 on continual improvement and I compare it to

Page 27

1 our health and safety program or  
 2 environmental management system, which are  
 3 also based on ISO standards in that on a  
 4 regular basis you are reviewing your, you  
 5 know, KPI is your key data, your key risks  
 6 and you're making adjustments routinely, you  
 7 know, so for health and safety at  
 8 Newfoundland Power, we have an annual review  
 9 with the full executive and management team  
 10 every year where our health and safety team  
 11 take us through, you know, what we're seeing  
 12 in terms of, you know, soft-tissue injuries  
 13 or slips and falls or switching incidents,  
 14 or whatever that may be, we look at where  
 15 the trends are going and we develop a new  
 16 action plan to address that and that, you  
 17 know, that delivers on that continual  
 18 improvement and we've seen improvement year  
 19 over year in terms of employee injuries as a  
 20 result of that, and that's how I see asset  
 21 management going. I see once we get, you  
 22 know, the key documentation in place, it  
 23 will be a routine, okay, let's sit down,  
 24 look at the system, look at what's happening  
 25 in terms of causes of outages or what we're

Page 28

1 finding on our inspections or the age of our  
 2 infrastructure, whatever all that may be,  
 3 costs as well, where are the trends going,  
 4 and then you will sit back as a team and say  
 5 what do we need to focus on over the next 12  
 6 months to make improvements, right, so it  
 7 will be an annual process.  
 8 GREENE, KC:  
 9 Q. In the response we see in No. 2 a Target  
 10 State Assessment which is the phase that's  
 11 currently ongoing, is that correct?  
 12 MR. CHUBBS:  
 13 A. No, I believe the response says that the  
 14 target state is completed and we're into  
 15 implementation planning now.  
 16 GREENE, KC:  
 17 Q. If you go down –  
 18 MR. CHUBBS:  
 19 A. I could be mistaken.  
 20 GREENE, KC:  
 21 Q. The target state, line 30, "If a Target  
 22 State Assessment phase is currently  
 23 underway", the response indicates there's a  
 24 couple of steps left in that, so I mean,  
 25 that's not –

Page 29

1 MR. CHUBBS:  
 2 A. Okay, yeah, sorry, I was mistaken, yes.  
 3 GREENE, KC:  
 4 Q. - that's not important.  
 5 MR. CHUBBS:  
 6 A. That's right.  
 7 GREENE, KC:  
 8 Q. I assume the Target State Assessment looks  
 9 at where you should be as opposed to where  
 10 you are now, is that correct?  
 11 MR. CHUBBS:  
 12 A. Yes, that's correct.  
 13 GREENE, KC:  
 14 Q. So I would also take from that that there  
 15 could be some, I'll call them significant  
 16 changes in how you could approach the  
 17 collection of data, your operational  
 18 procedures, your maintenance practices, is  
 19 that correct?  
 20 MR. CHUBBS:  
 21 A. There could be, yes.  
 22 GREENE, KC:  
 23 Q. So it could have, over time, some  
 24 significant changes to Newfoundland Power's  
 25 operations, is that correct?

Page 30

1 MR. CHUBBS:  
 2 A. It could over time, yes.  
 3 GREENE, KC:  
 4 Q. And there was another RFI, PUB-NP-151 which  
 5 goes to how Newfoundland Power foresees any  
 6 involvement or consultation with your  
 7 stakeholders being the Board, of course, who  
 8 is responsible for ensuring the operations  
 9 of the facility and your other stakeholders,  
 10 and the answer there is "No, there is no  
 11 consultation or other than updates in the  
 12 capital budget application." Do you foresee  
 13 the need, if there are going to possibly be  
 14 potential changes, significant changes, to  
 15 your operations, to your maintenance  
 16 practices, to your capital budget planning,  
 17 that there would be an interest from your  
 18 stakeholders, they'd have to be involved  
 19 than just getting updates?  
 20 MR. CHUBBS:  
 21 A. You know, we'd certainly be open to  
 22 conversations with stakeholders on how we're  
 23 progressing. Newfoundland Power has done a  
 24 lot of things over the years to, that have  
 25 significantly changed our operations. You

Page 31

1 know, we talk about the shift in our focus  
 2 on reliability and reliability improvements  
 3 in early 2000s, and that was when we first  
 4 implemented our current asset management  
 5 technology and processes around preventative  
 6 maintenance and inspections following that,  
 7 I guess, goal, that we set. I'm not aware  
 8 that there was any specific consultations  
 9 that happened over that time. It was just  
 10 the direction of management, we felt as a  
 11 company we needed to move. I also think  
 12 about, you know, the last decade or so and  
 13 probably, you know, maybe we can use DarkNL  
 14 as a trigger point there, but we've  
 15 integrated a lot of significant technologies  
 16 into our operations to help us respond  
 17 better for major events and outages. That  
 18 was a significant change in our operations  
 19 as well, and all of those changes typically  
 20 came forward through our capital budget  
 21 application which provides intervenors the  
 22 opportunity to ask questions on why we're  
 23 doing certain things and how we're  
 24 approaching it and which alternatives we've  
 25 considered. So that's been effective, I

Page 32

1 believe, for those processes. That's how we  
 2 see this unfolding as well, but it certainly  
 3 would not be opposed to any stakeholder  
 4 discussions that parties may be interested  
 5 in, happy to talk about it.  
 6 GREENE, KC:  
 7 Q. Now moving to operating costs. You've  
 8 already heard that Newfoundland Power, in  
 9 this application, is looking for 5.5 percent  
 10 increase overall, and of that 5.5 percent,  
 11 1.6 percent is due to operating costs, is  
 12 that correct, Mr. Chubbs?  
 13 MR. CHUBBS:  
 14 A. Yes, that's correct.  
 15 GREENE, KC:  
 16 Q. And I will be asking you to do some  
 17 explanations of cost increases from the last  
 18 test year, which was 2023 to the current  
 19 one, 2026, and we've already heard through  
 20 Ms. London that the increase in operating  
 21 costs over that period is 18 percent, is  
 22 that correct?  
 23 MR. CHUBBS:  
 24 A. Yes, that's correct.  
 25 GREENE, KC:



Page 33

1 Q. One of the explanations so far provided by  
 2 Newfoundland Power is the impact of  
 3 inflation, but you've always mentioned that  
 4 other costs are increasing that are  
 5 contributing to that significant increase in  
 6 operating costs that are beyond inflation,  
 7 is that correct?  
 8 MR. CHUBBS:  
 9 A. Yes, that's correct.  
 10 GREENE, KC:  
 11 Q. I'd like for us to look at information  
 12 system technology, so if we could go to PUB-  
 13 NP-022, Attachment A. So here, these would  
 14 be all the costs associated with your  
 15 information systems, is that correct?  
 16 MR. CHUBBS:  
 17 A. Yes, that's correct.  
 18 GREENE, KC:  
 19 Q. And if we look at the increase in the bottom  
 20 line from the 2023 test year to the 2026  
 21 forecast from 7.3 million to 9.2 million,  
 22 that would be an increase of about 25  
 23 percent, is that correct? Subject to  
 24 checking my math.  
 25 MR. CHUBBS:

Page 34

1 A. Subject to check, yes.  
 2 GREENE, KC:  
 3 Q. And I don't have a math background, but I'm  
 4 pretty sure that's correct. And even if we  
 5 looked at your 2022 test year from 6.4  
 6 million up to the 9.2, we would get an  
 7 increase of over 43 percent in your  
 8 information systems cost, so I'd like to  
 9 talk about each of the categories, other  
 10 than labour. The first one is other company  
 11 fees, and here we see them going from, in  
 12 the 2023 test year, 310,000 to 967,000 which  
 13 according to my math is over a 200 percent  
 14 increase. So we did ask you to explain the  
 15 increase, and here, if you want to go to the  
 16 response or would you—I would like what the  
 17 breakdown is and if you like, we can do  
 18 cyber security first, which you keep  
 19 mentioning as a significant cost increase.  
 20 MR. CHUBBS:  
 21 A. It is, so you're interested in cyber  
 22 security cost in other company fees or in  
 23 total?  
 24 GREENE, KC:  
 25 Q. In other company fees first.

Page 35

1 MR. CHUBBS:  
 2 A. Right, so the key change there, there would  
 3 be two costs that we're seeing related to  
 4 other company fees with cyber security.  
 5 GREENE, KC:  
 6 Q. And perhaps if you want, while we're talking  
 7 about it, if you could go to PUB-NP-141C.  
 8 There we go. So we do see that it more than  
 9 doubled, but it's only 300,000 of their  
 10 900,000.  
 11 MR. CHUBBS:  
 12 A. Correct. So a few things that we've  
 13 implemented over the last few years and I  
 14 think it's important to highlight our focus  
 15 on cyber security. About five years ago we  
 16 introduced a cyber security risk management  
 17 program at Newfoundland Power. This was a  
 18 response to heightened cyber security risks  
 19 that I would say all businesses are dealing  
 20 with, but utilities in particular have been  
 21 identified as key targets for threat actors  
 22 out there, right, organizations looking to  
 23 cause disruption. So when we implemented  
 24 that program, we worked with an external  
 25 consultant, PWC, who have expertise in this

Page 36

1 area, and they assessed Newfoundland Power  
 2 from a number of perspectives, but really  
 3 they're looking at, you know, what  
 4 vulnerabilities or what approaches may  
 5 hackers take to access our infrastructure.  
 6 So it could be as simple as getting on to  
 7 our website and using that to get on to our  
 8 corporate network, so do we have the  
 9 appropriate firewalls in place there. It  
 10 could be through fishing, you know, sending  
 11 a malicious email to an unsuspecting  
 12 employee who clicks on a link and they have  
 13 now installed software that gives someone  
 14 access to our system. It could be gaining  
 15 access to a substation and connecting into  
 16 our networks and operating our equipment, so  
 17 we've been doing this assessment with PWC  
 18 for each year since and that's part of the  
 19 cost.  
 20 GREENE, KC:  
 21 Q. Is that the reason for the 312,000,  
 22 consulting fee paid to PWC?  
 23 MR. CHUBBS:  
 24 A. So that would be within the original 145  
 25 because we've been doing that for five

Page 37

1 years. Something new that we've been doing  
 2 is annual, the annual penetration testing  
 3 that's highlight there, so we, as part of  
 4 our understanding, you know, how secure we  
 5 are, we hire hackers, you know, we hire  
 6 folks who are skilled at this to try and  
 7 access our systems in a number of ways and  
 8 we let them on our system and see how they  
 9 can move about, what they can access  
 10 internally, and this identifies if here are  
 11 any weaknesses in our technologies, in our  
 12 firewalls and our monitoring services that  
 13 we have in place as well.  
 14 (9:45 a.m.)  
 15 GREENE, KC:  
 16 Q. So again, that's in the 312,000.  
 17 MR. CHUBBS:  
 18 Q. That's in the 312 and that would be in  
 19 incremental. Incident response support, so  
 20 this is a key element of our cyber security  
 21 program is ensuring if you do have an event,  
 22 what you have in place, for incident  
 23 response, so as I mentioned for storms, we  
 24 have this in place for storms, we have an  
 25 incident response plan in place in case, you

Page 38

1 know, we were compromised or someone gained  
 2 access to our customer data or our  
 3 electricity system or encrypted all of our  
 4 data and we had no access to technology, so  
 5 we have response plans for all of that which  
 6 include customer communications and the  
 7 supports that we would need externally to  
 8 help us through that, that's part of it.  
 9 And just on the bottom of that page, you'll  
 10 see in 2024, the introduction and this would  
 11 be the largest incremental piece of this, of  
 12 our security information and event  
 13 management technology. So this was the,  
 14 probably the key piece of technology that  
 15 was in our technology roadmap to implement  
 16 over the last few years. We had, it was a  
 17 kind of building block, so we had to put  
 18 infrastructure in place before we could  
 19 implement this technology, but what that  
 20 does is it monitors traffic coming in and  
 21 out of Newfoundland Power's networks, but  
 22 also traffic going between our different  
 23 servers and networks within our system. And  
 24 identifies if there's any suspicious or  
 25 malicious activity happening. And as part

Page 39

1 of that, we've contracted a third party who  
 2 monitors that technology 24/7, so they have  
 3 their own 24/7 operation and they're  
 4 monitoring this for many, many utilities and  
 5 companies so that if something were to  
 6 happen, they will pick it up immediately and  
 7 can get in touch with who they need to get  
 8 in touch with at Newfoundland Power and we  
 9 can unplug or whatever we got to do, to stop  
 10 that activity, so that's an annual service  
 11 that we pay.  
 12 GREENE, KC:  
 13 Q. And these are different consultants, I  
 14 assume, and they're all within the 312,000  
 15 forecast for 2026 as consulting fees for IT,  
 16 is that correct?  
 17 MR. CHUBB:  
 18 A. Yes, that's correct.  
 19 GREENE, KC:  
 20 Q. Okay, so that still leaves us with  
 21 \$650,000.00, other than for security of the  
 22 967 that's in your forecast. So we look for  
 23 an explanation for that as well, which is if  
 24 you go down to C and D, well we see D there.  
 25 So for D, half a million for the SIEM

Page 40

1 service, that was in addition to the  
 2 consulting fees you just outlined, was it?  
 3 MR. CHUBBS:  
 4 A. No, it says there, well it's related to due  
 5 to the SIEM service, so the other part of  
 6 that technology so that SIEM service, you're  
 7 paying the software and licensing fee for  
 8 that technology as well. So there's two  
 9 components to that, one is the technology  
 10 cost and the other is the other company fee  
 11 or the external consultant cost to monitor  
 12 the technology.  
 13 GREENE, KC:  
 14 Q. So you pay the additional pay in addition to  
 15 the consulting fee and that fee is half a  
 16 million?  
 17 MR. CHUBBS:  
 18 Q. No, so there's two components there. So the  
 19 consulting fee is one component of it, and  
 20 the other piece is our new CC&B customer  
 21 care and bill system, that's our CIS system,  
 22 so this is a managed services contract that  
 23 we have in place to support our CIS system  
 24 coming out of that implementation. So this  
 25 is where a company that has the skills, the

Page 41

1 programming skills to implement any changes  
 2 or upgrades that need to occur on that  
 3 system, over the next few years. We see  
 4 that as a, you know, more of a short-term  
 5 measure as we develop those skills  
 6 internally at Newfoundland Power. So we see  
 7 that up to 2025, but I don't see that as a  
 8 longer-term cost.  
 9 GREENE, KC:  
 10 Q. And there's no breakdown between those two  
 11 and the 300 million and the 5 million gets  
 12 us to 800,000—half million, gets us to  
 13 800,00 but there's still another 150,000 not  
 14 explained which isn't on the record, so I'd  
 15 ask for an undertaking that we could have a  
 16 breakdown of the other consulting fees by  
 17 each fee and the amount so that we can see  
 18 the total.  
 19 MR. CHUBBS:  
 20 A. Okay.  
 21 MS. GLYNN:  
 22 Q. That would be Undertaking No. 9.  
 23 GREENE, KC:  
 24 Q. If we go back to PUB-NP-002, Attachment A,  
 25 we see other computing equipment and

Page 42

1 software and they're broken down by topics,  
 2 so we did actually ask for a breakdown of  
 3 those, so now—because these were main  
 4 categories, so can we go now to PUB-NP-140,  
 5 Attachment A, which provides the details for  
 6 each of those costs. So if you look, you  
 7 will see that this is the additional  
 8 breakdown and here we do see some  
 9 significant increases in costs. For  
 10 example, under infrastructure and network in  
 11 the 2023 test year is \$432,895.00 and going  
 12 up to \$856,500.00 which is a 95 percent  
 13 increase in the costs. So when we look, and  
 14 I don't intend—everyone will be happy to  
 15 hear it, to go through each one of these,  
 16 but I did want you to explain your headings  
 17 for Business Requirement. You have  
 18 replacement, ongoing, new and I think that's  
 19 it. Can you tell us what is a replacement  
 20 category and how you determined each of  
 21 these under these various headings required  
 22 to be replaced or retired and how you  
 23 determined that something new was required?  
 24 MR. CHUBBS:  
 25 A. So, replacement--effectively we manage our

Page 43

1 technology, our software, similar to how we  
 2 manage our infrastructure. We put a piece  
 3 of technology in place and we use that  
 4 technology for as long as we can to get the  
 5 maximum benefit from that technology. So, I  
 6 would say for the most part what you're  
 7 seeing here is technologies that are--that's  
 8 been indicated by the vendors that they will  
 9 no longer be supported past a certain date.  
 10 So, you know, a couple of examples in here--  
 11 I mentioned our asset management technology.  
 12 So, that vendor advised us that that system  
 13 is no longer supported past December 31st,  
 14 2026. Our GIS system, as I mentioned  
 15 before, the version that we use of that  
 16 today is--been indicated by the vendor will  
 17 no longer be supported past December 1st,  
 18 2027, and our Outage Management system  
 19 similarly is February 2028.  
 20 So, with technologies like this, you  
 21 know, they're critical to our operations.  
 22 We cannot effectively operate unsupported,  
 23 so that means we need to replace these  
 24 technologies, and that's what we have  
 25

Page 44

1 incorporated in our plan.  
 2 We're seeing the market for technology  
 3 fees increasing beyond inflation. We use  
 4 consulting services to help us understand,  
 5 you know, the appropriate technologies,  
 6 right size for our business, and they also  
 7 advise us on what's happening in terms of  
 8 cost to help us understand what we can  
 9 expect going forward, and we're seeing a  
 10 couple of things happening there. So, as we  
 11 look at replacing these technologies with  
 12 what I'll call their modern equivalent,  
 13 right--it's not like for like because a 20  
 14 year old technology, you know, that doesn't  
 15 exist today. So, the current modern  
 16 equivalent to that technology, we're seeing  
 17 increases in software licensing compared to  
 18 the older technologies, but what we  
 19 understand is going on in the market is a  
 20 couple of things.  
 21 There's a lot of labour demand for IT  
 22 professionals and technology programmers out  
 23 there, and that's driving cost with software  
 24 companies and software providers. That's  
 25

Page 45

1 driving licensing fees. And the other thing  
 2 that's occurring is related to cyber  
 3 security. So, we have I'll call direct  
 4 cyber security cost at Newfoundland Power  
 5 for technologies that specifically serve  
 6 that purpose.  
 7 One of the threats--one of the--as I  
 8 mentioned, the different approaches that  
 9 hackers to take to access your technology,  
 10 is they can find a vulnerability in a third  
 11 party piece of software you have, right, and  
 12 they use that to gain access to your  
 13 networks, and we've seen some significant  
 14 cyber security incidents happen at  
 15 organizations because of exactly that. You  
 16 know, I saw a headline the other day from  
 17 Halifax. The province -  
 18 GREENE, KC:  
 19 Q. Yes, we're all familiar with the risk of  
 20 cyber security, and the recent one with  
 21 automobiles, but -  
 22 MR. CHUBBS:  
 23 A. You got me going now.  
 24 GREENE, KC:  
 25

Page 46

1 Q. Yes, and I'm--you don't need to go there.  
 2 MR. CHUBBS:  
 3 A. But anyway, that's a driver. That is a  
 4 driver, and what it is doing is it's driving  
 5 more cost to these companies, and more  
 6 frequent upgrades, and more frequent  
 7 patching. Sorry.  
 8 GREENE, KC:  
 9 Q. Yes, and if we look at the next one, cyber  
 10 security, we see that's up by 39 percent,  
 11 and I keep comparing the '23 test year to  
 12 the '26 test year. And we go down to  
 13 Business backoffice is up by 59 percent. We  
 14 go down to Operations and Engineering, it's  
 15 actually up by 61 and a half percent, with  
 16 the overall increase from 2023, where your  
 17 computing equipment and software from 2023  
 18 to 2026 being a 44 percent increase, and we  
 19 saw a 200 percent increase in your  
 20 consulting fees. So, my question is, when  
 21 you prepared this application and looked at  
 22 this, did Newfoundland Power consider  
 23 reviewing its IT strategy to see if there  
 24 are other options and other solutions?  
 25

Page 47

1 That's my first question. And my second one  
 2 is, can rate payers expect to see these  
 3 types of increases every three years?  
 4 MR. CHUBBS:  
 5 A. We routinely review our approach to  
 6 technology investment. We do it  
 7 specifically by technology, every time we  
 8 replace a piece of technology. So, we  
 9 evaluate the alternatives, first off whether  
 10 we need that technology or not, and a great  
 11 example of that one was just last year we  
 12 upgraded our Workforce Management system,  
 13 which is that system that electronically  
 14 dispatches work to our crews. And we saw,  
 15 as I described, the incremental increase in  
 16 the ongoing licensing fee compared to the  
 17 old technology that we were using, and we  
 18 evaluated is this worthwhile anymore at  
 19 Newfoundland Power.  
 20 So, we evaluated what would happen if  
 21 we went back to paper, you know, if we had  
 22 to go back to dispatching work in bundles of  
 23 paper to crews in the field, and what  
 24 resources we would need to accomplish that,  
 25

Page 48

1 and it was clear that the Workforce  
 2 Management system still continued to be a  
 3 least cost, and that was part of our capital  
 4 budget application and identified as one of  
 5 the alternatives.  
 6 GREENE, KC:  
 7 Q. So, that's what you looked at for an  
 8 individual thing. I'm talking about the  
 9 overall strategy. Have you considered  
 10 outsourcing any of this, cloud-based  
 11 management of IT?  
 12 MR. CHUBBS:  
 13 A. Right. So, we definitely considered cloud  
 14 solutions. We have a number of solutions at  
 15 Newfoundland Power that are cloud based.  
 16 We've typically steered away from I'll say  
 17 the critical systems going to the cloud  
 18 because there are risks there. If you lose  
 19 access for whatever reason, you know, the  
 20 internet were to go down, what would that  
 21 mean for our operations.  
 22 So, we have--but we have implemented  
 23 the cloud solutions for I'll say less  
 24 critical. And another great example there  
 25

Page 49

1 was our CIS system that we implemented last  
 2 year. We looked at the cloud solution  
 3 versus the on-premise solution. We  
 4 ultimately went with on-premise, but as part  
 5 of that project we designed and took a  
 6 philosophy to designing our CIS system so  
 7 that in the future, if we did go cloud, it  
 8 would be an easy migration, and we did that  
 9 by minimizing the customizations that we did  
 10 with the technology that was provided. So,  
 11 if we want to migrate in the future, if it  
 12 was lower cost, we would do that, but cloud  
 13 is certainly part of our evaluation whenever  
 14 we're looking at a technology.  
 15 (10:00 a.m.)  
 16 GREENE, KC:  
 17 Q. And the second question as to whether these  
 18 costs will continue in your opinion at this  
 19 rate of increase?  
 20 MR. CHUBBS:  
 21 A. That's hard to predict. When you look at  
 22 our--what we've experienced over the last  
 23 three years versus what our test year was in  
 24 our last Rate Application, we certainly  
 25

Page 50

1 didn't anticipate where we are. I'd like to  
 2 think that it's not going to continue. I  
 3 think from a technology--if you're a  
 4 technology provider, they would have to  
 5 understand that this would not be  
 6 sustainable for all their customers, you  
 7 know, to see these kinds of increases. So,  
 8 you know, I'd like to think that it's a  
 9 short-term pressure that the industry is  
 10 responding to in resetting itself to respond  
 11 to cyber threats and, you know, getting the  
 12 labour market right size, likely post COVID,  
 13 you know, what they're experiencing, but I  
 14 don't have any information that would--that  
 15 I could guarantee these costs are not going  
 16 to continue at this level.  
 17 GREENE, KC:  
 18 Q. Turning now to another cost which you  
 19 haven't mentioned, but there is a  
 20 significant increase, and that is vegetation  
 21 management, and here, I think, it would be  
 22 helpful if we went to PUB Additional  
 23 Information Request No. 2, Schedule B,  
 24 Attachment 5. And I'll be using this page  
 25

Page 51

1 for a couple of additional costs we'll be  
 2 talking about.  
 3 There we can see it increased from,  
 4 it's line 25, 2.4 million, and it's  
 5 forecasted up to 3.4 million, and that's  
 6 roughly an increase of 41 percent. So, that  
 7 capture our attention and we asked--first I  
 8 should ask you, what is your plan or  
 9 strategy for vegetation management?  
 10 MR. CHUBBS:  
 11 A. So, in terms of vegetation management,  
 12 Newfoundland Power, we have almost 12,000  
 13 kilometres of transmission and distribution  
 14 lines. They pass by trees. They're built  
 15 through forested areas. We have to maintain  
 16 the right-of-way access to those lines to  
 17 ensure that our crews can respond when they  
 18 need to, and also to prevent outages  
 19 resulting from trees contacting our power  
 20 lines.  
 21 There are three main drivers there in  
 22 terms of cost, the first being our  
 23 inspection driven tree trimming. So, we  
 24 inspect all of our lines on a routine basis,  
 25

Page 52

1 and our inspectors identify if trees are  
 2 getting near power lines, or if access to  
 3 lines, if they're brush growing up and  
 4 there's going to be challenges accessing  
 5 those lines, and we cut those lines, clear  
 6 that brush, on a routine basis.  
 7 That's been increasing. We've seen an  
 8 increase in that in the last few years in  
 9 terms of the number of work orders that have  
 10 been required to be completed.  
 11 Second, is customer driven requests.  
 12 So, customers contact Newfoundland Power if  
 13 there's a tree near a power line, and  
 14 Newfoundland Power will clear that line. I  
 15 should say first we will visit the  
 16 customer's premise and identify whether  
 17 there's a hazard there, or whether it's safe  
 18 for the customer to clear the line  
 19 themselves so we don't incur that cost, but  
 20 if there is--it is near the line and we feel  
 21 that you need qualified personnel to clear  
 22 it we'll do that. We're seeing an increase  
 23 in those requests over the last few years.  
 24 And the third component of this cost is  
 25

Page 53

1 unplanned. So, we do have trees contacting  
 2 power lines on a regular basis. Often times  
 3 it's a tree that's outside of the right-of-  
 4 way that we've cleared that dies and falls,  
 5 and falls and makes contact with a line, and  
 6 so we have to respond to that to restore  
 7 power and clear that tree from that line.  
 8 So, those are the three main drivers.  
 9 We seen, and this is highlighted in  
 10 PUB-NP-141--when we look at the number of  
 11 inspection driven vegetation work orders  
 12 that we've completed, we did about--we're  
 13 doing about 400 a year of those jobs. The  
 14 last three years has been 578, that's the  
 15 average. So, that's a 45 percent increase  
 16 in that work. So, that's a key driver of  
 17 the cost.  
 18 And then second, on the customer  
 19 requests, we've gone from 1,589 on average  
 20 per year to 1,770 on average per year. So,  
 21 that's an 11 percent increase in the number  
 22 of customers contacting Newfoundland Power  
 23 and requesting trees trimmed on their  
 24 property.  
 25

Page 54

1 GREENE, KC:  
 2 Q. You mentioned that you do the inspections.  
 3 I understand that distribution inspections,  
 4 you do them twice in a seven year cycle, is  
 5 that correct?  
 6 MR. CHUBBS:  
 7 A. Yes, that's correct.  
 8 GREENE, KC:  
 9 Q. And that's been an ongoing practice, is that  
 10 correct?  
 11 MR. CHUBBS:  
 12 A. Yes, that's correct.  
 13 GREENE, KC:  
 14 Q. And for transmission line you do one  
 15 inspection per year, is that correct?  
 16 MR. CHUBBS:  
 17 A. Yes, that's correct.  
 18 GREENE, KC:  
 19 Q. If these inspections have been ongoing and a  
 20 regular part of your practice, why has there  
 21 been such a significant increase? I can see  
 22 the customer request, but for the others?  
 23 Is our vegetation growing faster, or -  
 24 MR. CHUBBS:  
 25

Page 55

1 A. Well, we chuckle at that, but that was  
 2 actually something that was highlighted in  
 3 the Provincial Government's Climate  
 4 Adaptation Plan, that the growing season in  
 5 Newfoundland is actually getting longer.  
 6 GREENE, KC:  
 7 Q. I was going to say, tell that to my plants  
 8 and shrubs please.  
 9 MR. CHUBBS:  
 10 A. Yes, but it's--you know, it's hard to  
 11 pinpoint exactly what's driving it. We're  
 12 finding more work out there to get  
 13 completed. It may be a longer growing  
 14 season that's driving it, but I can say  
 15 that, you know, it's an important aspect of  
 16 our operations, and if you're not clearing  
 17 trees from your lines, that's going to cause  
 18 further cost, and you're going to be--as I  
 19 was mentioning yesterday, if you don't do  
 20 that in a planned fashion, you'll be out in  
 21 the middle of the night clearing it from the  
 22 line on overtime, right. And I would also  
 23 point out, and this is worth mentioning,  
 24 that when you look at the impacts of  
 25

Page 56

1 Hurricane Fiona in PEI and Nova Scotia, a  
 2 huge part of the impact that that had on  
 3 their system was trees into lines, right.  
 4 So, when you think of climate adaptation,  
 5 it's only becoming more important that you  
 6 keep your lines clear of vegetation as best  
 7 you can.  
 8 GREENE, KC:  
 9 Q. In view of that, your response, and the  
 10 increase in the cost, have you considered  
 11 increasing the number of inspections that  
 12 you do? Right now you're doing them twice  
 13 in a seven year cycle. If they're growing  
 14 faster, have you looked at your practices to  
 15 see if it would be more effective to  
 16 increase the inspection rate or time?  
 17 MR. CHUBBS:  
 18 A. At this point we have not. As I mentioned,  
 19 in terms of asset management, your  
 20 vegetation management is part of that. So,  
 21 you know, maybe it's something that we  
 22 review at some point in time and determine  
 23 whether we feel we need to do it more  
 24 frequently. You are incurring additional  
 25

Page 57

1 cost to do more inspections, so you need to  
 2 be confident that you're off-setting your  
 3 vegetation cost. What I would expect is  
 4 your vegetation cost won't decrease, right.  
 5 Trees are still growing. So, if you inspect  
 6 more frequently means you're inspecting more  
 7 kilometres per year. So, we'll probably  
 8 still be doing the 578 per year, but you  
 9 would incur some additional cost when it  
 10 comes to, you know, the labour to inspect  
 11 the lines.  
 12 You might--it might---there may be an  
 13 opportunity there where may be you're  
 14 picking up something a year in advance that  
 15 doesn't fall into the line in the future so  
 16 it might have some impact on the unplanned  
 17 piece of work. So, it's certainly worth  
 18 consideration.  
 19 GREENE, KC:  
 20 Q. The last area of operating cost that you  
 21 have referred to is increasing beyond  
 22 inflation these other company fees, and if  
 23 we look here on the same page that's on the  
 24 screen--it is line 19, and here again we see  
 25

Page 58

1 a significant increase from 2.5 million in  
 2 2023 test year to 4.7 million in 2026, which  
 3 is an 81 percent increase, definitely more  
 4 than inflation. There are a number of RFI's  
 5 because you report the fees under different  
 6 categories, but there's no one response that  
 7 details all of the other company fees. Can  
 8 you tell us the main ones that are included  
 9 in the 4.7 million rate payers will be asked  
 10 to pay for?  
 11 MR. CHUBBS:  
 12 A. So, our other company fees are fees where we  
 13 pay to external organizations or consultants  
 14 to support us in different aspects of our  
 15 operations. For example, you know, audit,  
 16 our audit fees; legal fees; regulatory fees,  
 17 such as experts for these types of  
 18 proceedings; depression experts and such.  
 19 In here is also the IFRS conversion, right.  
 20 So, that's another company fee that we see  
 21 that's part of this amount. That's, I'll  
 22 say, one time, but it's over a three year  
 23 period, right.  
 24 GREENE, KC:  
 25

Page 59

1 Q. And because of the settlement agreement,  
 2 approximately half a million dollars will  
 3 come out of 2026 forecast for fees to  
 4 reflect the settlement agreement. That's  
 5 correct, right?  
 6 MR. CHUBBS:  
 7 A. That's correct, yes. It also includes  
 8 engineering consultants. So, when we need  
 9 specific expertise on an engineering project  
 10 we'll hire consultants to support us there  
 11 and, you know, things related to Human  
 12 Resources, if there's any legal fees there  
 13 that or employee assistance fees that we  
 14 incur. And then we went through the  
 15 technology costs as well, right, so those  
 16 external monitoring service and support  
 17 service. So, there's a fair amount of  
 18 activity in that.  
 19 What we're seeing is some of the key  
 20 drivers in other company fees over the next  
 21 few years. Outside of technology and cyber  
 22 security that we already mentioned in IFRS,  
 23 is regulation. So, we've got fees in there  
 24 that--you know, Hydro are expected to file  
 25

Page 60

1 their next General Rate Application I think  
 2 next year. So, we will be a part of that  
 3 proceeding. So, there's fees associated  
 4 with that and, you know, maybe expert fees  
 5 as well. Legal fees certainly. The  
 6 Reliability Resource Adequacy proceeding,  
 7 and we should see an update report to that,  
 8 and I think the expectation is there's going  
 9 to be some applications for new generation  
 10 on the Island, and Newfoundland Power is  
 11 very interested in the outcome of that  
 12 proceeding. So, we have fees in there  
 13 associated with those regulatory  
 14 proceedings, and then, you know, 2026 we'll  
 15 be thinking about our next Rate Application,  
 16 right. So, we look three years out from  
 17 today, you know, we're probably looking--  
 18 well, we're looking at a depreciation study  
 19 likely in 2026 and, you know, the associated  
 20 legal and expert fees as we're preparing for  
 21 our Rate Application as well. So, all those  
 22 fees are what would make up this estimate.  
 23 GREENE, KC:  
 24 Q. And because it's not on the record in terms  
 25

Page 61

1 of a breakdown of the 4.7 million, I'd ask  
 2 for an undertaking that there will be  
 3 provided a list of other company fees by  
 4 each fee that is included in the 4.7 million  
 5 for 2026 forecast.  
 6 MS. GLYNN:  
 7 Q. Undertaking number 10.  
 8 GREENE, KC:  
 9 Q. So, we've talked about the cost that have  
 10 exceeded inflation, and there's already been  
 11 some questions to you about inflation, and I  
 12 go back to questions that have been posed to  
 13 Mr. Murray, Ms. London, and by Mr.  
 14 Fitzgerald to you as well. Given the  
 15 significant increase customers are looking  
 16 at of over 20 percent, 23 percent by July 1  
 17 of 2025, of which almost 20 percent, or 19  
 18 percent, would be cost from Newfoundland  
 19 Power, some of that would be the flow  
 20 through of power supply cost, and I've taken  
 21 off the 2.25 for the rate mitigation—in  
 22 looking at that; I'm looking at some of the  
 23 significant increases, what action did  
 24 Newfoundland Power take to see if any of  
 25

Page 62

1 these costs could be deferred to a later  
 2 period, or whether they were absolutely  
 3 necessary.  
 4 MR. CHUBBS:  
 5 A. I think--as I mentioned yesterday, you know,  
 6 operating efficiency in Newfoundland Power  
 7 is a constant conversation. That's  
 8 something that we're always talking about.  
 9 It's on our minds, and we do--we've done a  
 10 lot of things over the last decade, and in  
 11 recent years, that have improved the  
 12 efficiency of our operations. I won't take  
 13 you through them all unless you really want  
 14 me to.  
 15 GREENE, KC:  
 16 Q. No, you've already done that a few times  
 17 with Mr. Fitzgerald, so, no, and they're on  
 18 the record. I'm not looking at what you did  
 19 in the past. We thank you for that, but we  
 20 want to know what you're going to do to help  
 21 out for where we are right now.  
 22 MR. CHUBBS:  
 23 A. So, we will keep that continued focus on  
 24 operating efficiency. We are--I think the  
 25

Page 63

1 key element of that is technology. We've  
 2 used a lot of technology to improve our--not  
 3 just our efficiency, but also the service we  
 4 provide to customers in terms of outage  
 5 response, in terms of contacting us, you  
 6 know, through various means, and it is a  
 7 continued focus for us. There are specific  
 8 things that we've done in our recent capital  
 9 budget applications in terms of operational  
 10 technologies and application enhancements  
 11 that reduce cost to Newfoundland Power as  
 12 well.  
 13 We continually--when you look at cost,  
 14 such as technology cost, we're evaluating  
 15 the least cost solution for our customers  
 16 where we can, where we negotiate software  
 17 licensing agreements. We're looking for  
 18 long-term contracts so that the variability  
 19 in cost is minimized as much as it can be.  
 20 So, I think it's important for the Board and  
 21 for our customers to understand that it is a  
 22 constant conversation at Newfoundland Power  
 23 how we can reduce cost.  
 24 We have experienced above average  
 25

Page 64

1 inflationary pressures in recent years that  
 2 are in line with GDP and what, you know, the  
 3 economy has seen over the last few years.  
 4 So, we're not immune to that. That has  
 5 certainly put pressures on our costs, but  
 6 we're doing everything we can to manage that  
 7 for our customers.  
 8 GREENE, KC:  
 9 Q. And I think I made the same comment. It  
 10 appears Newfoundland Power is carrying on  
 11 with this application as business as usual  
 12 and there was no need for them to take any  
 13 specific action to try to reduce their cost  
 14 above what they normally do, is that  
 15 correct?  
 16 MR. CHUBBS:  
 17 A. I would say that business as usual at  
 18 Newfoundland Power is constantly focusing on  
 19 reducing cost for our customers.  
 20 GREENE, KC:  
 21 Q. Thank you, Mr. Chubbs. That's the end of my  
 22 questions.  
 23 CHAIR:  
 24 Q. Okay, it's us.  
 25



Page 65

1 COMMISSIONER O'BRIEN:  
 2 Q. No questions.  
 3 CHAIR:  
 4 Q. And I've got no questions either.  
 5 MR. O'BRIEN:  
 6 Q. Nothing in re-direct.  
 7 MS. GLYNNE:  
 8 Q. Well, I guess we will take a quick break to  
 9 change witnesses. Thank you, Mr. Chubbs.  
 10 (BREAK – 10:19 a.m.)  
 11 (RESUME – 10:30 a.m.)  
 12 CHAIR:  
 13 Q. So, Mr. Brien, got your new witness?  
 14 MR. O'BRIEN:  
 15 Q. Thank you, Mr. Chair. Our next witness is  
 16 Michael Comerford and he's going to be  
 17 affirmed.  
 18 MR. MICHAEL COMERFORD, AFFIRMED, EXAMINATION-IN-CHIEF  
 19 BY MR. LIAM O'BRIEN  
 20 CHAIR:  
 21 Q. Back to you, Mr. O'Brien.  
 22 MR. O'BRIEN:  
 23 Q. Thank you, Mr. Chair. Mr. Comerford, would  
 24 you please introduce yourself?  
 25

Page 66

1 MR. COMERFORD:  
 2 A. Yes, good morning. I'm Michael Comerford,  
 3 Director of Rates and Supply at Newfoundland  
 4 Power.  
 5 MR. O'BRIEN:  
 6 Q. And can you tell me a bit about your  
 7 background and prior roles at Newfoundland  
 8 Power?  
 9 MR. COMERFORD:  
 10 A. I'm a professional engineer with a master's  
 11 in business administration. I joined  
 12 Newfoundland Power in 2007 as a controls and  
 13 automation engineer and became  
 14 superintendent of regional engineering for  
 15 St. John's region in 2010. I joined the  
 16 regulatory team in 2013 and became director  
 17 of rates and supply in 2022.  
 18 MR. O'BRIEN:  
 19 Q. And what part of the company's evidence will  
 20 you be testifying to?  
 21 MR. COMERFORD:  
 22 A. I'm adopting as my testimony Section 5 of  
 23 the evidence, including Newfoundland Power's  
 24 cost of service and rate design, as well as  
 25 the company's rebuttal evidence. The Cost

Page 67

1 of Service Study is found in Volume 2 of the  
 2 application. In my testimony, I will speak  
 3 to Newfoundland Power's rate designs, cost  
 4 of service matters, including customer  
 5 contributions.  
 6 MR. O'BRIEN:  
 7 Q. And are there any changes you'd like to make  
 8 to the pre-filed evidence or the relevant  
 9 exhibits?  
 10 MR. COMERFORD:  
 11 A. Not at this time.  
 12 MR. O'BRIEN:  
 13 Q. Mr. Comerford, is Newfoundland Power  
 14 proposing any changes to its rate designs as  
 15 part of this GRA?  
 16 MR. COMERFORD:  
 17 A. No, Newfoundland Power has not proposed any  
 18 changes in its rate designs or cost of  
 19 service methodology as a part of the 2025-  
 20 2026 GRA. The company is proposing the  
 21 average customer rate increase be applied to  
 22 all customer rate classes. Newfoundland  
 23 Power is currently in the process of  
 24 completing a rate design review with input  
 25 from the Board, Consumer Advocate and Hydro.

Page 68

1 Given changes underway on the Island  
 2 Interconnected System, including the  
 3 integration of the Muskrat Falls Project, it  
 4 would not be appropriate to implement new  
 5 rate designs until they are comprehensively  
 6 reviewed. This includes evaluating  
 7 alternative rate designs and understanding  
 8 the impacts they would have on customers.  
 9 MR. O'BRIEN:  
 10 Q. Mr. Comerford, the Consumer Advocate's  
 11 expert, Mr. Bowman, is recommending changes  
 12 to the company's rate designs as part of  
 13 this GRA. What changes is he proposing?  
 14 MR. COMERFORD:  
 15 A. Mr. Bowman is recommending that Newfoundland  
 16 Power modify its rate designs to reflect  
 17 lower marginal energy costs. His  
 18 recommendation is based on changing cost  
 19 dynamics on the provincial electricity  
 20 system. For domestic customers, Mr. Bowman  
 21 recommends moving from a flat energy charge  
 22 to a two-block energy charge. The second  
 23 block would be lower than the first.  
 24 Newfoundland Power's general service  
 25 customer rates including a declining block

Page 69	<p>1 rate structure. Mr. Bowman recommends</p> <p>2 reducing the second block further to be more</p> <p>3 reflective of marginal costs.</p> <p>4 MR. O'BRIEN:</p> <p>5 Q. Mr. Comerford, why doesn't Newfoundland</p> <p>6 Power agree with Mr. Bowman's</p> <p>7 recommendations in the area of rate design?</p> <p>8 MR. COMERFORD:</p> <p>9 A. Mr. Bowman is recommending changes in</p> <p>10 Newfoundland Power's rate designs while the</p> <p>11 company is undertaking a rate design review.</p> <p>12 The rate design review is being completed in</p> <p>13 consultation with the Board, the Consumer</p> <p>14 Advocate and Hydro. Newfoundland Power has</p> <p>15 also engaged a consultant to assist in rate</p> <p>16 design review. In addition to changes in</p> <p>17 marginal energy costs, there are several</p> <p>18 other factors that need to be considered</p> <p>19 when making changes to customer rate</p> <p>20 designs. These include potential changes to</p> <p>21 basic customer charges and demand charges</p> <p>22 that may also be appropriate. Changes in</p> <p>23 customer rate classes will also be</p> <p>24 considered as a part of the review. Changes</p> <p>25 in customer rate designs require input from</p>	Page 71	<p>1 the reasonableness of a utility's rates.</p> <p>2 Newfoundland Power assesses the fairness of</p> <p>3 its customer rates by comparing the revenue</p> <p>4 collected from each class with a cost to</p> <p>5 serve that class. This is the revenue to</p> <p>6 cost ratio which is determined in the cost</p> <p>7 of service study. As per past rulings of</p> <p>8 the Board, Newfoundland Power has focused on</p> <p>9 maintaining revenue to cost ratios within</p> <p>10 the range of 90 percent to 110 percent.</p> <p>11 This achieves fairness in rate design and</p> <p>12 avoids undue cross subsidization. The cost</p> <p>13 of service study filed with our application</p> <p>14 reveals revenue to cost ratios in this range</p> <p>15 for customers in each rate class. As a</p> <p>16 result, and as previously mentioned, the</p> <p>17 company is proposing to apply the average</p> <p>18 rate increase to all customer rate classes.</p> <p>19 MR. O'BRIEN:</p> <p>20 Q. Can you explain how the company ensures it's</p> <p>21 treating customers fairly when it comes to</p> <p>22 its rates?</p> <p>23 MR. COMERFORD:</p> <p>24 A. Newfoundland Power ensures fairness to</p> <p>25 customers by following a schedule of rates,</p>
Page 70	<p>1 customers. Similar to the last rate design</p> <p>2 review, the company's ongoing review will</p> <p>3 include customer engagement to assess the</p> <p>4 acceptability of any changes to customer</p> <p>5 rate designs. Finally, changes in customer</p> <p>6 rate designs that are introduced without a</p> <p>7 comprehensive review could have unintended</p> <p>8 consequences. For example, Mr. Bowman's</p> <p>9 recommendation to redesign the domestic rate</p> <p>10 to include a load tail-block energy rate,</p> <p>11 could cause peak demand on the electricity</p> <p>12 system to increase at a time when the</p> <p>13 electricity system is capacity constrained.</p> <p>14 Changes in rate design should follow a</p> <p>15 comprehensive review which the company is in</p> <p>16 the process of conducting.</p> <p>17 MR. O'BRIEN:</p> <p>18 Q. Now, Mr. Comerford, your evidence will</p> <p>19 address cost of service as well. What can</p> <p>20 you tell the Board about the embedded cost</p> <p>21 of service study filed with the company's</p> <p>22 application?</p> <p>23 MR. COMERFORD:</p> <p>24 A. Recover of the cost of service is generally</p> <p>25 accepted as the basis standard in assessing</p>	Page 72	<p>1 rules and regulations, contribution in aid</p> <p>2 of construction policy and cost of service</p> <p>3 methodology, all of which have been</p> <p>4 specifically reviewed and approved by the</p> <p>5 Board. The schedule of rates, rules and</p> <p>6 regulations includes Newfoundland Power's</p> <p>7 approved rates, as well as regulations that</p> <p>8 determine the requirement for a customer to</p> <p>9 make a contribution for facilities that are</p> <p>10 not recovered through customer rates.</p> <p>11 The contribution in aid of construction</p> <p>12 policy is used to determine how much a</p> <p>13 customer will be required to pay upfront for</p> <p>14 their electrical service. The policy</p> <p>15 recognizes that service to some customers</p> <p>16 will not be fully recovered through their</p> <p>17 electricity rates. As a result, they have</p> <p>18 to pay an upfront amount. Newfoundland</p> <p>19 Power reviews all general service CIAC's</p> <p>20 after two years to determine if there should</p> <p>21 be any additional charge or refund provided</p> <p>22 to the customer.</p> <p>23 The cost of service methodology</p> <p>24 determines how Newfoundland Power allocates</p> <p>25 costs to each customer class. The company's</p>

Page 73

1 cost of service methodology was reviewed in  
 2 detail at the request of the Board as part  
 3 of the company's 2003 General Rate  
 4 Application. Adherence to these schedules,  
 5 policies and methodologies ensures customers  
 6 are treated fairly.  
 7 MR. O'BRIEN:  
 8 Q. Now, Mr. Comerford, what recommendations is  
 9 Mr. Bowman making in relation to the  
 10 company's approved schedule or rates, rules  
 11 and regulations, cost of service methodology  
 12 and the CIAC policy?  
 13 MR. COMERFORD:  
 14 A. Mr. Bowman's recommendations are based on  
 15 various positions, particularly as they  
 16 relate to radial transmission facilities and  
 17 facilities that benefit just one customer.  
 18 MR. O'BRIEN:  
 19 Q. And do you agree that changes are required?  
 20 MR. COMERFORD:  
 21 A. No, I do not. The existing Board approved  
 22 policies and methodologies adequately ensure  
 23 that customers are treated in a manner that  
 24 is fair and reasonable and not unduly  
 25 discriminatory. Newfoundland Power

Page 74

1 addressed these positions in the rebuttal  
 2 evidence filed with the Board on May 28th.  
 3 MR. O'BRIEN:  
 4 Q. Mr. Comerford, does that conclude your  
 5 testimony?  
 6 MR. COMERFORD:  
 7 A. Yes, it does.  
 8 MR. O'BRIEN:  
 9 Q. Pass that over to -  
 10 CHAIR:  
 11 Q. Okay. So, it's over to Consumer Advocate.  
 12 Mr. Fitzgerald.  
 13 MR. MICHAEL COMERFORD, CROSS-EXAMINATION BY STEPHEN  
 14 FITZGERALD, KC  
 15 FITZGERALD, KC:  
 16 Q. Thank you, Mr. Chair. Good morning, Mr.  
 17 Comerford.  
 18 MR. COMERFORD:  
 19 A. Good morning.  
 20 FITZGERALD, KC:  
 21 Q. I'm Steve Fitzgerald. I'm representing the  
 22 Consumer Advocate. Just going back to the  
 23 beginning of your testimony, your  
 24 educational background. You indicated you  
 25 graduated from Memorial University? Is that

Page 75

1 correct?  
 2 MR. COMERFORD:  
 3 A. Yes, that's correct. I graduated from  
 4 Memorial University in 2002 with a Bachelor  
 5 of Engineering degree and again in 2013 with  
 6 a master's in business.  
 7 FITZGERALD, KC:  
 8 Q. Okay. And what were you doing between 2002  
 9 and 2013?  
 10 MR. COMERFORD:  
 11 A. In 2002, I started my career with a local  
 12 engineering firm. I was there for five  
 13 years. It was a – I did a lot of  
 14 interesting work actually with renewable  
 15 energy systems in Labrador. But after five  
 16 years of that, I started to be employed by  
 17 Newfoundland Power. So, in 2007 to 2013, I  
 18 was employed with Newfoundland Power.  
 19 FITZGERALD, KC:  
 20 Q. And you started in what position? You said  
 21 it, but I didn't quite catch it.  
 22 MR. COMERFORD:  
 23 A. I started as a controls and automation  
 24 engineer.  
 25 FITZGERALD, KC:

Page 76

1 Q. And that was just a – were you recruited by  
 2 Newfoundland Power or did you apply to an  
 3 advertised position or how did that work?  
 4 MR. COMERFORD:  
 5 A. I applied for a position at Newfoundland  
 6 Power and found out I had an interview with  
 7 Newfoundland Power, as a matter of fact,  
 8 when I was in Labrador at a remote site.  
 9 So, I was very pleased to get an interview.  
 10 FITZGERALD, KC:  
 11 Q. Get warmed up. So, currently now, you're  
 12 the Director of Rates and Supply. I believe  
 13 that's what you indicated.  
 14 MR. COMERFORD:  
 15 A. Yes, that's correct.  
 16 FITZGERALD, KC:  
 17 Q. Right. And do you take part in the  
 18 company's executive compensation plan?  
 19 MR. COMERFORD:  
 20 A. At the director level, yes, but certainly  
 21 not at the executive level.  
 22 FITZGERALD, KC:  
 23 Q. So, what is the compensation plan then for  
 24 directors? Is it just straightforward  
 25 salary or other incentives?

Page 77

1 MR. COMERFORD:  
 2 A. There is a salary component and there's also  
 3 a short-term incentive as well, which is 15  
 4 percent.  
 5 FITZGERALD, KC:  
 6 Q. 15 percent of your base salary?  
 7 MR. COMERFORD:  
 8 A. Yes, that's correct.  
 9 FITZGERALD, KC:  
 10 Q. And since when have you been entitled to  
 11 that?  
 12 MR. COMERFORD:  
 13 A. Since November 2022 I would have been  
 14 entitled to that.  
 15 FITZGERALD, KC:  
 16 Q. Okay. So, that's relatively recent, and  
 17 have you achieved the STI for those past  
 18 couple years?  
 19 MR. COMERFORD:  
 20 A. I have achieved the STI. Yes, that's  
 21 correct, to varying degrees. I mean, there  
 22 are different components of it, but I did  
 23 receive STI.  
 24 FITZGERALD, KC:  
 25 Q. STI, but are you suggesting not the full 15

Page 78

1 percent?  
 2 MR. COMERFORD:  
 3 A. No, I believe it was – I can't recall  
 4 exactly how much it was, but I think it was  
 5 pretty close to the 15 percent.  
 6 FITZGERALD, KC:  
 7 Q. Okay. So, you also indicated that you, at  
 8 one point you were the manager of regulatory  
 9 affairs?  
 10 MR. COMERFORD:  
 11 A. Yes, that's correct.  
 12 FITZGERALD, KC:  
 13 Q. And you are now? Sorry, yes?  
 14 MR. COMERFORD:  
 15 A. I'm not the manager of regulatory affairs  
 16 now.  
 17 FITZGERALD, KC:  
 18 Q. Okay.  
 19 MR. COMERFORD:  
 20 A. That was in the past.  
 21 FITZGERALD, KC:  
 22 Q. In the past, right. So, in your capacity,  
 23 in that capacity or your current capacity,  
 24 have you ever designed a rate for electric  
 25 transmission service?

Page 79

1 MR. COMERFORD:  
 2 A. No, I have not.  
 3 FITZGERALD, KC:  
 4 Q. Have you ever designed a retail rate?  
 5 MR. COMERFORD:  
 6 A. No, the rate designs that are currently  
 7 place at Newfoundland Power had been  
 8 designed prior to my taking on this  
 9 position.  
 10 FITZGERALD, KC:  
 11 Q. Right. As I understand, as we understand,  
 12 the last rate design for Newfoundland Power  
 13 was completed in 2010, correct?  
 14 MR. COMERFORD:  
 15 A. Yes, that's correct.  
 16 FITZGERALD, KC:  
 17 Q. And that's what's being used currently?  
 18 MR. COMERFORD:  
 19 A. Yes, that's what's being used right now, and  
 20 as I indicated in my direct testimony, we  
 21 are currently in the process of conducting a  
 22 new rate design review, which of course the  
 23 Consumer Advocate and other parties are  
 24 participating in.  
 25 FITZGERALD, KC:

Page 80

1 Q. Right. So, it is true though that  
 2 Newfoundland Power is proposing an increase  
 3 in all components of each retail rate by the  
 4 proposed 5.5 percent. Is that correct?  
 5 MR. COMERFORD:  
 6 A. Yes, to the extent possible, yes. We  
 7 decided, in preparation for the General Rate  
 8 Application, and in light of all the  
 9 uncertainties on the system right now with  
 10 regards to wholesale rates and Muskrat Falls  
 11 costs being included in customer rates that  
 12 we would make a straight five percent  
 13 increase to the rate components for this  
 14 general rate application.  
 15 FITZGERALD, KC:  
 16 Q. So, and can you just, for the record, what  
 17 are the components of the rate?  
 18 MR. COMERFORD:  
 19 A. Well, for domestic customers, there's two  
 20 parts. One is a basic customer charge and  
 21 another is the energy charge, flat energy  
 22 charge. For general service customers,  
 23 there is a basic customer charge. There's  
 24 also demand charges and then there are also  
 25 energy charges as well and there are energy

Page 81

1 charges are first block and second block  
 2 energy charges.  
 3 FITZGERALD, KC:  
 4 Q. And so again, the 5.5 percent rate increases  
 5 is on all those components, for the domestic  
 6 on the basic charge and the energy charge?  
 7 MR. COMERFORD:  
 8 A. Yes, that is correct.  
 9 FITZGERALD, KC:  
 10 Q. And likewise for general service for all  
 11 three components that you just went through,  
 12 the basic, the demand and the energy charge?  
 13 MR. COMERFORD:  
 14 A. Yes, that is correct.  
 15 FITZGERALD, KC:  
 16 Q. If we could go to CA-NP-118 please? And the  
 17 answer there to the question -- Newfoundland  
 18 Power was asked a series of questions  
 19 related to rate design for the domestic  
 20 class and Newfoundland Power indicated to  
 21 that question that, in line 20 there,  
 22 "Newfoundland Power is not proposing any  
 23 changes to its rate design at this time."  
 24 That's correct?  
 25 MR. COMERFORD:

Page 82

1 A. That's correct, yes.  
 2 (10:45 a.m.)  
 3 FITZGERALD, KC:  
 4 Q. And does that answer come from your  
 5 department?  
 6 MR. COMERFORD:  
 7 A. Well, I mean, that answer is a reflection of  
 8 what was in the General Rate Application and  
 9 as a part of our application, as I  
 10 indicated, we made no changes to our rate  
 11 designs.  
 12 FITZGERALD, KC:  
 13 Q. But there are proposed changes, of course,  
 14 to the rates themselves?  
 15 MR. COMERFORD:  
 16 A. Yes, that is correct.  
 17 FITZGERALD, KC:  
 18 Q. Right. So, was there any thought of doing  
 19 some rate design prior to just doing the  
 20 blunt 5.5 percent across the board average  
 21 increase?  
 22 MR. COMERFORD:  
 23 A. Well, I think what we considered when we  
 24 were developing the General Rate Application  
 25 was there are a lot of uncertainties on the

Page 83

1 system. We are, in fact, right now, at a bi  
 2 of an inflection point, I guess, on the  
 3 electricity system as it relates to Holyrood  
 4 effectively becoming less – playing less of  
 5 a role on the system and Muskrat Falls  
 6 playing a greater role on the system, and  
 7 with that comes a lot of changing cost  
 8 dynamics, including embedded costs, as well  
 9 as marginal costs. So, effectively, as a  
 10 part of this rate design or this general  
 11 rate application, and in light of the  
 12 uncertainties that are upon us, and as well,  
 13 recognizing the fact that we are currently  
 14 in the process of conducting a rate design  
 15 review, we did not make any adjustments to  
 16 our rate designs.  
 17 FITZGERALD, KC:  
 18 Q. Okay. So, the 5.5 rate increase is detached  
 19 from any rate design considerations?  
 20 MR. COMERFORD:  
 21 A. The 5.5 percent rate increase was applied to  
 22 all rate components.  
 23 FITZGERALD, KC:  
 24 Q. Without regard to any rate design issues?  
 25 MR. COMERFORD:

Page 84

1 A. That's correct. We're currently in the  
 2 process of completing the rate design  
 3 review. So, we kept our rate structures and  
 4 marginal costs signalling effectively  
 5 unchanged as a part of this rate  
 6 application.  
 7 FITZGERALD, KC:  
 8 Q. Okay. Can we go to PUB-NP-004A? If you go  
 9 to page two, at line 16, you say,  
 10 "implementation of a new wholesale rate by  
 11 January 1, 2025 would allow for the change  
 12 in marginal cost to be reflected in the  
 13 wholesale rate within a reasonable  
 14 timeframe. This is consistent with  
 15 regulatory principle of practical  
 16 attributes." Could you expand on that  
 17 statement a little bit piece?  
 18 MR. COMERFORD:  
 19 A. Yes. I mean, in general, you know, you do  
 20 want to align your rates with marginal  
 21 costs. There are practical attributes to  
 22 doing that. With regards to the wholesale  
 23 rate and in comparison to Newfoundland  
 24 Power, I think what we need to think about  
 25 there is Newfoundland Power is one customer

Page 85

1 of Hydro. We have a singular utility rate  
 2 that applies solely to Newfoundland Power.  
 3 So, there are – we have been working on a  
 4 wholesale rate structure with Hydro and of  
 5 course, there’s a regulatory – there’s a  
 6 framework in place for that. But like I  
 7 said, that is two companies. We are working  
 8 together to get the wholesale framework  
 9 correct and get those price signals correct.  
 10 When we look at Newfoundland Power’s rates,  
 11 I think things are a little bit different,  
 12 and that’s because each one of our rate  
 13 classes has, you know, some have 60  
 14 customers and others have thousands of  
 15 customers. So, when you make changes in  
 16 retail rate designs, you have to be very  
 17 careful that you’re not making any changes  
 18 that might impact one customer adversely  
 19 compared to some others.  
 20 FITZGERALD, KC:  
 21 Q. Let’s look at further in the same RFI at  
 22 line 22, and you’re saying here that, “the  
 23 change in the wholesale rate would be  
 24 relatively straightforward”. Why would such  
 25 a change in the wholesale rate be relatively

Page 86

1 straightforward?  
 2 MR. COMERFORD:  
 3 A. I would say relatively straightforward,  
 4 that’s in terms of two utilities and their  
 5 professional accountants working together to  
 6 establish a new utility rate. We have  
 7 developed a framework to be able to do that  
 8 and we’ve outlined a regulatory process that  
 9 we can achieve it. That would be a little  
 10 bit different from looking at applying any  
 11 changes to Newfoundland Power’s own customer  
 12 rates, of course.  
 13 FITZGERALD, KC:  
 14 Q. Right. We’ll get to that in a second, but  
 15 I’m just trying to understand the principles  
 16 here. So, if we go down further at line 32,  
 17 it says, “as such, any sales growth beyond  
 18 2023 levels would be costed at the lower  
 19 marginal rate resulting in lower overall  
 20 cost for customers. This is also consistent  
 21 with the regulatory principle of practical  
 22 attributes and is consistent with the  
 23 Board’s recognition of the importance that  
 24 correct price signals are reflected in rates  
 25 to customers”. Rates to customers I

Page 87

1 understand that would – that same principle  
 2 would apply to both wholesale and retail  
 3 rates, correct?  
 4 MR. COMERFORD:  
 5 A. That would apply to wholesale and retail  
 6 rates, but as I mentioned, Newfoundland  
 7 Power’s rate classes have many different  
 8 customers. Some of them receive power on  
 9 the tail-block and some of them do not. So,  
 10 applying the wholesale energy rate and the  
 11 principles used there, I think you can do  
 12 that broadly, but I think it’s very  
 13 important to consider that when Newfoundland  
 14 Power makes changes to its rate designs that  
 15 affect its customers, then we really need to  
 16 be careful about any customer rate impacts  
 17 that could result from that.  
 18 FITZGERALD, KC:  
 19 Q. Right, but I guess the – we’re just going  
 20 back to first principles though.  
 21 Newfoundland Power says itself here further  
 22 down in line 34, this is also we’re talking  
 23 about, you know, the marginal rates. It  
 24 says, “this is also consistent with  
 25 regulatory principles of practical

Page 88

1 attributes and is consistent with the  
 2 Board’s recognition of the importance that  
 3 correct signals are reflected in rates to  
 4 customers”. So, that’s the over – that’s  
 5 the guiding principle that – you know, is  
 6 that the Board says that the correct price  
 7 signals are reflected in rates to customers  
 8 and that means that the marginal rate should  
 9 be transparent or clear?  
 10 MR. COMERFORD:  
 11 A. Yes, and as a matter of fact, I would also  
 12 point out that our marginal tail-block  
 13 energy rate for our general service  
 14 customers are more aligned with the new  
 15 utility rate based on Muskrat Falls marginal  
 16 cost than they would have been in the past.  
 17 FITZGERALD, KC:  
 18 Q. Sorry, could you repeat that, what you just  
 19 said?  
 20 MR. COMERFORD:  
 21 A. Yeah. What I was referring to is  
 22 Newfoundland Power’s tail-block in its  
 23 general service customer rate classes is a  
 24 declining tail-block. Historically, with  
 25 the utility rate that has been in effect

Page 89

1 with Holyrood, that has reflected an  
 2 inclining tail-block. So, what’s  
 3 effectively happening now, and with a  
 4 revised utility rate that we’ll hopefully  
 5 see soon enough, is that our rates are  
 6 actually becoming more aligned with the  
 7 wholesale rate structure. So, our rates are  
 8 well positioned to provide those marginal  
 9 price signals and are better positioned than  
 10 they have been in the past.  
 11 FITZGERALD, KC:  
 12 Q. Are you just – are you referring to both  
 13 classes, domestic and general service?  
 14 MR. COMERFORD:  
 15 A. No, just general service, because domestic  
 16 only has a flat energy rate.  
 17 FITZGERALD, KC:  
 18 Q. Right. So, but the same principle would  
 19 apply to domestic service, that correct  
 20 price signal should be reflected in rates?  
 21 That’s the principle.  
 22 MR. COMERFORD:  
 23 A. Well, with domestic, it’s a little tougher  
 24 because there are no demand charges for  
 25 domestic customers, you know, so you’re left

Page 90

1 with whether or not you have an inclining  
 2 domestic rate or a declining domestic rate.  
 3 We have a flat energy rate at Newfoundland  
 4 Power and it has been the case for some  
 5 time. Making changes to the domestic rate  
 6 to have it – make it a declining block rate  
 7 structure, for example, is something that  
 8 would – we would have to look at very  
 9 carefully if we were to try and put those  
 10 price signals through to customers.  
 11 FITZGERALD, KC:  
 12 Q. I understand there would be challenges, but  
 13 the principle is the same? That is, it  
 14 should reflect marginal cost. It’s more  
 15 difficult for – you’re saying, and we’ll get  
 16 to that in a second – to design the rate to  
 17 do what the Board expects and that is to  
 18 send correct price signals. There may be  
 19 challenges to do that for the domestic  
 20 class, but the principle is the same.  
 21 Domestic customers should have the correct  
 22 price signal as well, correct?  
 23 MR. COMERFORD:  
 24 A. Well, see, the trick with the domestic  
 25 customers is that there’s no demand charge.

Page 91

1 So, while, you know, there may be some  
 2 ability to reflect marginal energy costs in  
 3 the domestic rate, there’s no real ability  
 4 at the moment to reflect any marginal  
 5 capacity costs.  
 6 FITZGERALD, KC:  
 7 Q. Yeah, again, that’s a technical challenge  
 8 though. The principle is the same, that  
 9 they – it would be – the ideal would be for  
 10 them to receive the correct price signal,  
 11 correct?  
 12 MR. COMERFORD:  
 13 A. Yes, that is correct, yeah. And I would  
 14 also say, with regards to that, that when  
 15 you’re looking at setting rates for  
 16 customers, of course, we’re all guided by  
 17 the Bonbright principles. There are a  
 18 number of principles. Price efficiency is  
 19 one of them. Of course, you have to balance  
 20 the issue of price efficiency with other  
 21 factors as well and some of those include  
 22 stability, effectiveness and those types of  
 23 things.  
 24 FITZGERALD, KC:  
 25 Q. Just turn to the same RFI, page 3, at line

Page 92

1 9, and here it says -- Newfoundland Power  
 2 says, “a new wholesale rate would allow the  
 3 company to better plan its customer rate  
 4 designs”. Do you need a new wholesale rate  
 5 to design retail rates?  
 6 MR. COMERFORD:  
 7 A. It’s certainly very helpful to have a  
 8 wholesale rate that is well structured and  
 9 reflective of marginal costs. One of the  
 10 things that – you know, it’s been a big  
 11 uncertainty for a number of years, many  
 12 years now, about what our utility rate will  
 13 look like in the future, and I think one of  
 14 the things that we have to consider as well  
 15 is the new utility rate looks like it will  
 16 encompass some seasonal attributes as well,  
 17 and this is a change because historically,  
 18 the marginal energy cost at Holyrood has  
 19 been for the full year and what we’re seeing  
 20 now with Hydro’s wholesale rate, wholesale  
 21 rate framework is that they want to look at  
 22 the seasonal attributes of cost recovery  
 23 based on their marginal costs. So, that’s  
 24 another factor to consider. So, it is  
 25 important to have, you know, good

Page 93

1 information available when you're designing  
 2 wholesale rates, you know, and that's one  
 3 aspect of it. You don't necessarily need  
 4 that, but it's certainly helpful and other  
 5 information to have available is certainly  
 6 important as well, including indication of  
 7 what your future embedded costs are, and  
 8 we're getting more certainty on that in the  
 9 past month or so.

10 FITZGERALD, KC:  
 11 Q. Back to what we were talking about, the  
 12 first principles of price signal. Would it  
 13 be preferable that the tail-block energy  
 14 charge and the wholesale rate reflect  
 15 marginal cost and the tail-block energy  
 16 charge and the retail rate also reflect  
 17 marginal costs?

18 MR. COMERFORD:  
 19 A. Well, you have to be very careful, as I had  
 20 indicated before, about reflecting the full  
 21 marginal energy costs in your customer  
 22 rates. Right now, there is a big difference  
 23 between marginal energy costs and embedded  
 24 costs. So, the degree at which you fully  
 25 reflect it is something that takes careful

Page 94

1 consideration and we need to do things like  
 2 customer impact studies basically to see if  
 3 you do drop, for example, the tail-block  
 4 rate of a general service customer from up  
 5 around nine cents down to four cents and  
 6 then you're going to create an impact with  
 7 that customer. For our general service  
 8 customer that really isn't in the tail-  
 9 block, you know, they're likely to see a  
 10 much different rate change. Their rates  
 11 would likely go up. So, when you look at  
 12 implementing and reflecting marginal costs  
 13 in a rate design, you really need to be  
 14 careful and you really need to think about  
 15 the customer and what the customer impacts  
 16 are going to be.

17 FITZGERALD, KC:  
 18 Q. Would there be benefits though if that was  
 19 achieved, that is the marginal cost  
 20 reflected both in the tail-block and the  
 21 retail rates?

22 MR. COMERFORD:  
 23 A. Yeah, as a part of our retail rate design  
 24 review, that's ongoing. That is one of the  
 25 things that we're looking at, is to look at

Page 95

1 our general service tail-block energy  
 2 charges, but we also have to look at our  
 3 demand charges as well. Certainly on the  
 4 system, with regards to energy, while the  
 5 marginal energy costs may be low, marginal  
 6 capacity costs are very high and our demand  
 7 charges should probably be changed to  
 8 reflect some of that as well, and that is  
 9 the kind of analysis and information that  
 10 comes out of a retail rate design review,  
 11 which is the one that we're currently  
 12 conducting.

13 (11:00 a.m.)  
 14 FITZGERALD, KC:  
 15 Q. Could we go to PUB-NP – sorry, go to the  
 16 original pre-filed evidence or the  
 17 application itself, Table 410 in Section 4  
 18 of the application. Right, okay. So, this  
 19 is the energy supply costs, 2026  
 20 calculation, and if in fact the tail-block  
 21 energy charge and the wholesale rate  
 22 reflected marginal cost and the tail-block  
 23 energy charge and the retail rate reflected  
 24 marginal cost, would this variance amount  
 25 shown at Table 410 actually be closer to

Page 96

1 zero instead of the current 35?

2 MR. COMERFORD:  
 3 A. Are you simply referring to the wholesale  
 4 rate?

5 FITZGERALD, KC:  
 6 Q. No. I'm saying if the tail-block energy  
 7 charge and the wholesale rate reflected  
 8 marginal cost and the tail-block energy  
 9 charge in retail rates reflected marginal  
 10 costs, would that change this table?

11 MR. COMERFORD:  
 12 A. Certainly this table, I believe, is for the  
 13 energy supply cost variance.

14 FITZGERALD, KC:  
 15 Q. Right.

16 MR. COMERFORD:  
 17 A. Which was an analysis for – based on changes  
 18 in the wholesale rate. I mean, Newfoundland  
 19 Power's energy sales would change, you know,  
 20 I guess, depending on what the wholesale  
 21 utility rate is, but I don't know that I can  
 22 really draw the comparison between matching  
 23 up retail rates and the wholesale rate and  
 24 the effect that it would have on the energy  
 25 supply cost variance.



Page 97

1 FITZGERALD, KC:  
 2 Q. Okay. We'll come back to that. If we could  
 3 go back to the RFI we were looking at, PUB-  
 4 NP-004 at page 3, line 12? It says, "in  
 5 Newfoundland Power's view, there are no  
 6 customer benefits in maintaining the current  
 7 wholesale rate beyond January 1, 2025". So,  
 8 can you explain that?  
 9 MR. COMERFORD:  
 10 A. Sure. The current wholesale rate, as I'm  
 11 sure a lot of us know, is set – has a tail-  
 12 block rate set at 18 cents per kilowatt  
 13 hour, which is very high. So, any changes  
 14 in energy sales effectively are costed at 18  
 15 cents per kilowatt hour. So, that – you  
 16 know, what we're talking about with aligning  
 17 the wholesale rate to actual marginal cost  
 18 should diminish variances in our purchase  
 19 power costs and that should benefit  
 20 customers and eliminate some of the  
 21 volatility that we've seen in recent years.  
 22 FITZGERALD, KC:  
 23 Q. Well, wouldn't there also be customer  
 24 benefits associated with maintaining current  
 25 retail rates beyond January 2025?

Page 98

1 MR. COMERFORD:  
 2 A. Would there be benefits in maintaining  
 3 rates?  
 4 FITZGERALD, KC:  
 5 Q. Without making changes to reflect the  
 6 marginal cost.  
 7 MR. COMERFORD:  
 8 A. Yeah, there are benefits to maintaining  
 9 rates without changing marginal cost to  
 10 customers. You know, one of those things is  
 11 certainly stability of customer rates.  
 12 Customers are familiar with their existing  
 13 rates and rate designs and charges. So,  
 14 there's certainly benefits to that.  
 15 FITZGERALD, KC:  
 16 Q. Well, if there's benefits to, you know, to  
 17 the customer for – from January – you know,  
 18 with the changes to retail rates that's  
 19 coming in January 2025, wouldn't there  
 20 equally be benefits to changing of the  
 21 retail rates?  
 22 MR. COMERFORD:  
 23 A. Not necessarily, no, because when you change  
 24 retail rates, if you're going to change your  
 25 – let's just say you're going to change your

Page 99

1 tail-block energy charge from ten cents down  
 2 to five cents, effectively you're going to  
 3 have to put a higher first block energy  
 4 charge in there as well. So, some customers  
 5 would certainly benefit from it because they  
 6 may consume energy in the second block. But  
 7 other customers who consume perhaps not as  
 8 much electricity in the second block, then  
 9 they would likely see a rate increase. So,  
 10 this goes back to the customer rate impact  
 11 issue that we have when we change rates for  
 12 retail customers versus changing rates for,  
 13 I guess, two utilities changing the rate  
 14 that is charged from one to the other.  
 15 CHAIR:  
 16 Q. Excuse me, Mr. Fitzgerald, I think we'll  
 17 take our break first.  
 18 FITZGERALD, KC:  
 19 Q. Okay. Thank you, Mr. Chair.  
 20 (BREAK – 11:05 a.m.)  
 21 (RESUME - 11:31 a.m.)  
 22 CHAIR:  
 23 Q. Any preliminary matters, Ms. Glynn?  
 24 MS. GLYNN:  
 25 Q. No, Mr. Chair.

Page 100

1 CHAIR:  
 2 Q. Okay, so back to Mr. Fitzgerald.  
 3 FITZGERALD, KC:  
 4 Q. Thank you, Mr. Chair. Mr. Comerford, just  
 5 before moving to another topic, if we could  
 6 go to June 17th transcript, please, at page  
 7 156, there's a statement here by Ms. London  
 8 with respect to revised wholesale rates,  
 9 sorry, Mr. Comerford, I've lost the  
 10 reference, scroll up a little bit. Perhaps  
 11 down a little bit. At one point here,  
 12 sorry, line 6, 156, it says, "Number one,  
 13 the marginal cost that customers will pay  
 14 will be reflective of the actual marginal  
 15 costs on the system." Is that true?  
 16 MR. COMERFORD:  
 17 A. So this is in relation to the wholesale  
 18 framework, change to wholesale rate on  
 19 January 1st, 2025, and yes, I believe that's  
 20 what the intention is with regards to the  
 21 wholesale rate framework is to reflect  
 22 Hydro's marginal energy costs in the tail-  
 23 block of the utility rate to Newfoundland  
 24 Power.  
 25 FITZGERALD, KC:

Page 101

1 Q. So when we see the word “customers” there,  
 2 that the customer is actually Newfoundland  
 3 Power?  
 4 MR. COMERFORD:  
 5 A. No, I think that’s referring to customers,  
 6 Newfoundland Powers’ customers, so the  
 7 benefits of having a wholesale rate that  
 8 reflects marginal costs from Hydro is less  
 9 volatility in any annual July 1st rate  
 10 changes.  
 11 FITZGERALD, KC:  
 12 Q. But there’s no suggested or proposed change  
 13 to the retail rate which –  
 14 MR. COMERFORD:  
 15 A. That’s correct, there’s no change to the  
 16 retail rate. This, I think, was in the  
 17 context of an annual rate change that would  
 18 occur on July 1st, so when you have a Hydro  
 19 utility rate that has 18 cent kilowatt hour  
 20 on the tail-block and if you’re experiencing  
 21 growth which means you have to purchase  
 22 additional energy from Hydro, then that  
 23 additional energy on the system is costing  
 24 18 cents a kilowatt hour and that has, you  
 25 know, that has created rate pressure. So

Page 102

1 having a utility rate that reflects the  
 2 lower marginal costs will alleviate some of  
 3 that rate pressure as more energy is  
 4 consumed on the system.  
 5 FITZGERALD, KC:  
 6 Q. Yeah, I guess that was a difference, I  
 7 suppose, when you say “alleviate”, but this  
 8 word that Ms. London is using is “actual  
 9 marginal costs on the system.” I understand  
 10 what you’re saying, but there’s still, there  
 11 will still be a distortion, if you will, of  
 12 the rate, the retail rate won’t be  
 13 reflecting marginal costs, so customers  
 14 will, yes, there will be some change in the  
 15 marginal cost because the wholesale rate is  
 16 reflective in their bills, but it will not  
 17 bring it down to an actual reflection of a  
 18 customer’s bill; that is, when a customer  
 19 gets their bill, there might be an actual  
 20 change or there might be an actual affect of  
 21 the change in the wholesale rate, but it  
 22 will not bring the retail rate or the entire  
 23 rate that they’re paying within the bounds  
 24 of the absolutely correct price signal,  
 25 correct?

Page 103

1 MR. COMERFORD:  
 2 A. This is the wholesale rate structure and  
 3 changing it from the 18 cents down to  
 4 marginal costs that are on the system now,  
 5 does have a lot of benefits to customers and  
 6 those benefits mean that there will be less  
 7 costs being passed on to customers in the  
 8 future with any changes in load growth. But  
 9 this has nothing to do with marginal, like  
 10 retail rates.  
 11 FITZGERALD, KC:  
 12 Q. Okay, so that was my question, this has  
 13 nothing to do with retail rates, so when it  
 14 says the marginal cost that customers will  
 15 pay will be reflective of the actual  
 16 marginal cost on the system, I didn’t quite  
 17 understand that, the actual cost on the  
 18 system when it distills down to their  
 19 individual bills, there will still be a, as  
 20 I say, a distortion of the retail rate. The  
 21 retail rate, as you’ve indicated this  
 22 morning, I believe, will not now or then  
 23 reflect actual marginal costs.  
 24 MR. COMERFORD:  
 25 A. Yes, as I indicated this morning, we haven’t

Page 104

1 made any rate adjustments to our tail-blocks  
 2 as a part of this General Rate Application  
 3 for general service customers. We kept our  
 4 rate design stable and that is to reflect,  
 5 you know, the fact that we are doing a rate  
 6 design review right now and we’re looking at  
 7 all of those individual components, tail-  
 8 block charges, demand charges, basic  
 9 customer charges, we also have to look at  
 10 seasonal attributes of our retail rates, so  
 11 there’s many factors that we have to look  
 12 at, but no, we did not change any marginal  
 13 or reflect any change in marginal costs in  
 14 our general service rates as a part of this  
 15 GRA.  
 16 FITZGERALD, KC:  
 17 Q. Or the domestic rates.  
 18 MR. COMERFORD:  
 19 A. Well, yeah, similarly domestic rates and as  
 20 I indicated earlier, with domestic rates  
 21 it’s challenging to reflect marginal costs  
 22 there because they have a basic customer  
 23 charge and a flat energy charge. There’s no  
 24 demand charge component associated with  
 25 domestic customers and there’s no blocking

Page 105

1 structure with domestic rates as well.  
 2 FITZGERALD, KC:  
 3 Q. With respect to the GRA and Newfoundland  
 4 Power’s decision to increase each component  
 5 of each retail rate by 5.5 percent, were you  
 6 given any direction with respect to retail  
 7 rates?  
 8 MR. COMERFORD:  
 9 A. Was I given any direction? No, it certainly  
 10 would have been my recommendation that we  
 11 keep things stable for our customers while  
 12 we’re doing our rate design review.  
 13 FITZGERALD, KC:  
 14 Q. Was there any comprehensive review of the  
 15 rate design prior to implementing this  
 16 initiative to raise the rates by 5.5  
 17 percent?  
 18 MR. COMERFORD:  
 19 A. No, we’re currently in the process of doing  
 20 a rate design review and that is why we  
 21 applied the 5 percent across the board on  
 22 those rate components.  
 23 FITZGERALD, KC:  
 24 Q. So if you’re undertaking to study that, that  
 25 means that you don’t know the answer, that

Page 106

1 is Newfoundland Power doesn’t know what the  
 2 effect is of a 5.5 percent increase on rates  
 3 would be.  
 4 MR. COMERFORD:  
 5 A. I’m not sure what impact you might be  
 6 referring to there.  
 7 FITZGERALD, KC:  
 8 Q. Well you’ve indicated that it was your  
 9 recommendation that, I think now, I don’t  
 10 mean to put words in your mouth, but that  
 11 the 5.5 percent increase on domestic rate,  
 12 that was on all the components of that rate  
 13 and it was just, the directive was we’re  
 14 just going to do a blanket 5.5 percent  
 15 increase on the retail rates, for example.  
 16 You did that without a comprehensive study,  
 17 that’s what I understand you just said, so  
 18 that tells me that when you did it, you were  
 19 somewhat, Newfoundland Power was somewhat  
 20 blind as to whether this was a proper  
 21 approach or not?  
 22 MR. COMERFORD:  
 23 A. No, I don’t think that’s a fair way to look  
 24 at it. We looked at our revenue to cost  
 25 ratios for customer rates as a part of our

Page 107

1 cost of service study and those revenue to  
 2 cost ratios were within 90 to 110 percent.  
 3 We looked at all the uncertainty that was  
 4 happening on the system, things that are  
 5 materializing now and we’re getting some  
 6 answers which is great, but because of that,  
 7 we made a conscious decision that we would  
 8 keep our rates, rate design stable, and also  
 9 recognizing that we are in the process of  
 10 working with Consumer Advocate, Hydro and  
 11 the Board on actual rate design review to  
 12 assess these things, so, you know, we made a  
 13 pragmatic decision to keep things, rate  
 14 design stable for our customers while we are  
 15 undergoing our rate design review.  
 16 FITZGERALD, KC:  
 17 Q. Okay, fair enough, a pragmatic decision was  
 18 made, it may turn out that if the result of  
 19 the comprehensive review could possibly  
 20 indicate that the decision to implement the  
 21 5.5 percent increase across the board, was  
 22 not justified?  
 23 MR. COMERFORD:  
 24 A. And that would have to follow, of course,  
 25 the completion of our rate design review.

Page 108

1 There’s information that we’re getting as a  
 2 part of the review, such as additional load  
 3 research, we’re having new embedded costs  
 4 that we’re able to look at, so there’s a  
 5 number of factors that, I guess there’s a  
 6 lot of ingredients that go into a rate  
 7 design, and so we’re assembling all of those  
 8 ingredients to be able to put forward a  
 9 comprehensive review with input from all  
 10 stakeholders and including our own customers  
 11 before we move ahead with any rate designs.  
 12 FITZGERALD, KC:  
 13 Q. So I guess we can conclude then that the 5.5  
 14 percent pragmatic decision to increase rates  
 15 across all components was not justified by a  
 16 comprehensive review.  
 17 MR. COMERFORD:  
 18 A. Well I think it’s justified because we’re in  
 19 the process of doing a comprehensive review.  
 20 FITZGERALD, KC:  
 21 Q. But it is true, according to your evidence,  
 22 that the 5.5 percent did not derive from a  
 23 comprehensive review, it derived from a  
 24 pragmatic decision that was made without a  
 25 comprehensive review, would you agree?

Page 109

1 MR. COMERFORD:  
 2 A. So Newfoundland Power completes  
 3 comprehensive rate design reviews  
 4 periodically. The last one we completed was  
 5 in 2010 and that has served our rate designs  
 6 quite well. We don't do comprehensive  
 7 reviews as a part of every General Rate  
 8 Application. Comprehensive reviews are  
 9 costly and they take time and energy, so we  
 10 initiated our comprehensive review following  
 11 our last General Rate Application and we're  
 12 in the process of doing that, so I guess  
 13 what I'm saying is that we didn't do a  
 14 comprehensive review right before we started  
 15 a comprehensive review.  
 16 FITZGERALD, KC:  
 17 Q. Okay, well we'll leave that issue, your  
 18 answer is on the record, so from your  
 19 experience, how long would it take to  
 20 redesign the retail rates to better reflect  
 21 marginal costs?  
 22 MR. COMERFORD:  
 23 A. Well, it takes, when we're redesigning our  
 24 rates, we're looking at, we need input from  
 25 our customers, we need to do rate impact

Page 110

1 studies, we need to look at what marginal  
 2 costs we want to reflect better in our rate  
 3 structures. For example, do we want to  
 4 focus on our demand marginal costs and  
 5 increase our demand costs, look at changes  
 6 in seasonal demand cost based on changes in  
 7 the marginal, you know, demand costs that we  
 8 have on the system right now. So there's a  
 9 number of different factors that go into  
 10 redesigning rates and that is exactly the  
 11 process that we're into right now.  
 12 FITZGERALD, KC:  
 13 Q. So all those components of what sounds like  
 14 a complicated task, you know, would you be  
 15 able to estimate how long that would take?  
 16 MR. COMERFORD:  
 17 A. Well the rate, I would say that the rate  
 18 design review that commenced prior to the  
 19 one we're currently doing, was borne out of  
 20 the 2008 General Rate Application and it was  
 21 a settlement agreement established at that  
 22 General Rate Application. In the next  
 23 General Rate Application, which was in 2010,  
 24 the parties all agreed that, well there's a  
 25 rate review happening right now, there were

Page 111

1 no real rate design changes proposed at that  
 2 time and rate design changes were actually  
 3 implemented in the next GRA. So right now,  
 4 like if you consider it, we had a General  
 5 Rate Application in 2022, 2023, a settlement  
 6 agreement was for a rate design review to be  
 7 commenced at that time. Here we are now in  
 8 the next GRA, similar to 2008 where we went  
 9 to the 2010 GRA, when the review wasn't  
 10 fully complete, and what we're expected to  
 11 implement rates as a part of the next GRA  
 12 that Newfoundland Power had, so the path  
 13 we're on right now, effectively, is  
 14 following the path that we had with our  
 15 previous rate design review.  
 16 FITZGERALD, KC:  
 17 Q. So what would you conclude, what is the  
 18 timeframe?  
 19 MR. COMERFORD:  
 20 A. Our timeframe for completing our rate design  
 21 review is 2026.  
 22 FITZGERALD, KC:  
 23 Q. And that was, that's the fallout or the  
 24 outcome from the settlement agreement in  
 25 2023?

Page 112

1 MR. COMERFORD:  
 2 A. As a part of our 2022, 2023 General Rate  
 3 Application, that is the current timing that  
 4 we're on, yes.  
 5 FITZGERALD, KC:  
 6 Q. And I take it that the initiative to  
 7 commence the rate design review commenced  
 8 immediately after the settlement agreement?  
 9 MR. COMERFORD:  
 10 A. Newfoundland Power, as a part of the  
 11 settlement agreement, we started to engage  
 12 in our rate design review and our load  
 13 research study as well. What we did was  
 14 file a detailed framework with a cost  
 15 estimate after consulting with the parties,  
 16 and we filed that with the Board on, I think  
 17 it was December, 2022.  
 18 FITZGERALD, KC:  
 19 Q. Sorry, what particular document was that?  
 20 MR. COMERFORD:  
 21 A. That was the load research and rate design  
 22 framework that was directed by the Board as  
 23 a part of the, their order in relation to  
 24 Newfoundland Power's 2022, 2023 General Rate  
 25 Application.

Page 113

1 (11:45 a.m.)  
 2 FITZGERALD, KC:  
 3 Q. So the consultant’s report that appeared on  
 4 April 1st of this year, the Christensen  
 5 Report or CACEA Energy Consultants, when  
 6 were they engaged?  
 7 MR. COMERFORD:  
 8 A. Christensen were engaged September 13th,  
 9 2023.  
 10 FITZGERALD, KC:  
 11 Q. 2023. So several months before this General  
 12 Rate Application was put forward?  
 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:  
 20 A. Well, we worked throughout 2023, you know,  
 21 as a part of our work towards the load  
 22 research and rate design review. We filed  
 23 information, as I indicated we filed our  
 24 framework with the Board in December of  
 25 2022. We updated the parties in March of

Page 114

1 2023 on our progress. In July, we sent our  
 2 scope of work to the parties, including the  
 3 Consumer Advocate and receive comments back  
 4 later on in July. In August, we provided  
 5 our response back to the Consumer Advocate  
 6 with regards to their feedback and in  
 7 September then it was awarded to  
 8 Christensen.  
 9 FITZGERALD, KC:  
 10 Q. But the question was when did you first  
 11 involve Christensen?  
 12 MR. COMERFORD:  
 13 A. Well there’s request for proposals had to go  
 14 out, but the work associated with  
 15 Christensen was awarded in September of  
 16 2023.  
 17 FITZGERALD, KC:  
 18 Q. Is there any explanation for the delay in  
 19 retaining this expert?  
 20 MR. COMERFORD:  
 21 A. No, I think, you know, we’ve been working  
 22 very hard on both the rate design review  
 23 process and the load research process  
 24 throughout the period. What we have  
 25 provided, I guess, Christensen, as you know,

Page 115

1 has provided a Phase One Rate Design Report  
 2 which was circulated with the parties in  
 3 April. And I think one of the things to  
 4 consider as a part of the rate design review  
 5 process is that we, when we started upon it  
 6 and everyone recognized in the scope of work  
 7 that we had to break up the rate design  
 8 review into two phases, and that’s because  
 9 we didn’t have all the information available  
 10 to us in order to do a comprehensive  
 11 quantitative review of our rates. So we  
 12 broke it up into two phases. The first  
 13 phase was the report that Christensen has  
 14 provided, basically it provides a  
 15 qualitative review of Newfoundland Power’s  
 16 rates in light of changing wholesale  
 17 marginal costs on the system, and that, you  
 18 know, that review was provided and is out  
 19 for comments from the parties. Throughout  
 20 the process as well, Phase 2, we couldn’t  
 21 start, can’t start until we get more  
 22 certainty with regard to updated costs and  
 23 also our load research study, so we’re, you  
 24 know, I think right now we’re in a very good  
 25 position when it comes to our rate design

Page 116

1 review because we have a Phase One report.  
 2 We understand what rate mitigation is going  
 3 to look like for the next six years, so we  
 4 have a better understanding of our embedded  
 5 costs in the future. We’re having a—the  
 6 wholesale rate structure is going to change  
 7 and we have a good idea what that’s going to  
 8 look like, and that looks a little bit  
 9 different from what we had initially thought  
 10 because they’re billing in a seasonable  
 11 component to the utility rate to align with  
 12 the marginal costs. So really right now,  
 13 like we’re getting all the information  
 14 together that we need that is really—and the  
 15 timing is good because we recognize that  
 16 there’s, we couldn’t do all the work all at  
 17 once because we simply didn’t have the  
 18 information. But right now, I think we are  
 19 really assembling all the ingredients, you  
 20 know, for our rate design review so that we  
 21 can do a real comprehensive thorough review  
 22 that will benefit customers into the future,  
 23 I guess, as we look into the Muskrat Falls  
 24 era.  
 25 FITZGERALD, KC:

Page 117

1 Q. And when do you expect that to land, the  
 2 final?  
 3 MR. COMERFORD:  
 4 A. 2026 retail rate design review is the plan  
 5 completion. We also have work planned for  
 6 2024 as well, including customer engagement,  
 7 feedback from the parties and those types of  
 8 things.  
 9 FITZGERALD, KC:  
 10 Q. If Newfoundland Power had implemented a  
 11 smart meter program, would that have  
 12 informed the load research that you require  
 13 for this rate design?  
 14 MR. COMERFORD:  
 15 A. If we had smart meters, then yes, that would  
 16 have probably had implications on our load  
 17 research study.  
 18 FITZGERALD, KC:  
 19 Q. It would have assisted, I would suggest.  
 20 MR. COMERFORD:  
 21 A. It could have assisted our load research  
 22 study, yes.  
 23 FITZGERALD, KC:  
 24 Q. Yesterday when Mr. Chubbs was on the stand,  
 25 he referred to a number of cost benefit

Page 118

1 studies undertaken by Newfoundland Power on  
 2 smart meters, are you familiar with any of  
 3 those?  
 4 MR. COMERFORD:  
 5 A. It's not my direct responsibility but I am  
 6 certainly familiar that we've been looking  
 7 at AMI meters and smart meters in terms of  
 8 cost justification.  
 9 FITZGERALD, KC:  
 10 Q. So is there a hard document at Newfoundland  
 11 Power that actually concludes after a review  
 12 of smart meters that it does not meet least  
 13 cost criteria at this point?  
 14 MR. COMERFORD:  
 15 A. Not that I'm aware of, but as I indicated,  
 16 that's not really in my area of  
 17 responsibility.  
 18 FITZGERALD, KC:  
 19 Q. Okay. Mr. Chubbs also indicated yesterday  
 20 that Newfoundland Power's target reliability  
 21 of 40 percent better than Canadian average  
 22 is consistent with least cost service and  
 23 are you aware of any studies that  
 24 Newfoundland Power has to support that  
 25 conclusion?

Page 119

1 MR. COMERFORD:  
 2 A. Sorry, what was that conclusion?  
 3 FITZGERALD, KC:  
 4 Q. The conclusion is that the target  
 5 reliability of 40 percent better than the  
 6 Canadian average is consistent with least  
 7 cost service? It saves consumers' money to  
 8 have a 40 percent better than Canadian  
 9 average saving.  
 10 MR. COMERFORD:  
 11 A. Was the question am I aware of any studies  
 12 in that regard?  
 13 FITZGERALD, KC:  
 14 Q. Yeah, are you aware of—we're looking for the  
 15 database that supports that conclusion.  
 16 MR. COMERFORD:  
 17 A. I'm not personally aware of any studies in  
 18 that regard.  
 19 FITZGERALD, KC:  
 20 Q. Okay, is that maybe in the sort of hopper or  
 21 the type of decision that Newfoundland Power  
 22 makes on a pragmatic level that they don't  
 23 really feel it's necessary to study the fact  
 24 that it's 40 percent better than Canadian  
 25 average is consistent with least cost

Page 120

1 service, is that a pragmatic conclusion that  
 2 Newfoundland Power makes or was that a  
 3 common-sense one that they believe they make  
 4 without having the required studies?  
 5 MR. COMERFORD:  
 6 A. I mean, I'm not, I know that was Mr. Chubbs'  
 7 evidence, you know, with regards to detailed  
 8 studies, I'm not aware of any detailed  
 9 studies on that particular topic.  
 10 FITZGERALD, KC:  
 11 Q. Just briefly on the Long Pond substation,  
 12 Mr. Chubbs indicated that the 3.3 million  
 13 dollar upgrade to the substation that serves  
 14 MUN includes a new transformer and retaining  
 15 the original as a redundant transformer.  
 16 MR. COMERFORD:  
 17 A. Yes, that's correct.  
 18 FITZGERALD, KC:  
 19 Q. Right. Does this mean that you have a  
 20 redundant transformer at a substation that  
 21 provides a redundant source of supply?  
 22 MR. COMERFORD:  
 23 A. There is a transformer located at Memorial  
 24 University or at the Long Pond substation  
 25 that was paid for by Memorial University

Page 121

1 that provides redundancy to the Memorial  
 2 University.  
 3 FITZGERALD, KC:  
 4 Q. So it is a redundant transformer at—and it  
 5 is a substation that provides a redundant  
 6 source of supply?  
 7 MR. COMERFORD:  
 8 A. Yes, and I'll just like to make the point  
 9 that the university paid for all of the  
 10 costs associated with that.  
 11 FITZGERALD, KC:  
 12 Q. So MUN is paying for the redundant  
 13 transformer?  
 14 MR. COMERFORD:  
 15 A. The university paid a contribution for the  
 16 full cost of that redundant transformer,  
 17 yes, that's correct.  
 18 FITZGERALD, KC:  
 19 Q. So do we have a percentage, a rough idea of  
 20 what their contribution was? It wasn't a  
 21 hundred percent.  
 22 MR. COMERFORD:  
 23 A. Yes, it was a full hundred percent  
 24 contribution.  
 25 FITZGERALD, KC:

Page 122

1 Q. For the transformer?  
 2 MR. COMERFORD:  
 3 A. Paid for the transformer, yes, that is  
 4 correct.  
 5 FITZGERALD, KC:  
 6 Q. Does Newfoundland Power intend to refund  
 7 Memorial for the 4.6 million that was spent  
 8 on the substation back in 2020, I think it  
 9 was?  
 10 MR. COMERFORD:  
 11 A. To refund?  
 12 FITZGERALD, KC:  
 13 Q. Yeah.  
 14 MR. COMERFORD:  
 15 A. No, that was a contribution paid by the  
 16 university for the establishment of the Long  
 17 Pond substation and the redundant  
 18 transformer that is there.  
 19 FITZGERALD, KC:  
 20 Q. But the 3.3 for the transformer, that was  
 21 not paid by for MUM?  
 22 MR. COMERFORD:  
 23 A. That's correct, the new transformer, if we  
 24 consider now we're talking about another  
 25 transformer at Long Pond substation, that is

Page 123

1 required to supply a new load at the  
 2 university to service their electric  
 3 boilers.  
 4 FITZGERALD, KC:  
 5 Q. That's the anticipated load we talked about  
 6 yesterday.  
 7 MR. COMERFORD:  
 8 A. Yes, that is correct.  
 9 FITZGERALD, KC:  
 10 Q. And that hasn't materialized to date.  
 11 MR. COMERFORD:  
 12 A. No, they haven't completed the project to  
 13 date.  
 14 FITZGERALD, KC:  
 15 Q. Okay, Mr. Chairman, those are our questions,  
 16 thank you.  
 17 CHAIR:  
 18 Q. Thank you. Over to Mr. Simmons.  
 19 SIMMONS, KC:  
 20 Q. Thank you, no questions for this witness,  
 21 Mr. Chairman.  
 22 CHAIR:  
 23 Q. I think IBEW is not there, so we'll move  
 24 over to Ms. Greene.  
 25 GREENE, KC:

Page 124

1 Q. I have no questions, Mr. Chairman.  
 2 CHAIR:  
 3 VICE-CHAIR NEWMAN:  
 4 Q. I have no questions.  
 5 COMMISSIONER O'BRIEN:  
 6 Q. No questions.  
 7 CHAIR:  
 8 Q. I have one. It was just about the  
 9 transformer and the expansion of the Lond  
 10 Pond substation for the additional  
 11 transformer to supply load growth, so and  
 12 it's my understanding of the discussion  
 13 yesterday the additional load growth, when  
 14 you estimate the amount of additional  
 15 revenue, excluding power supply costs, to  
 16 determine how much is compensatory, that's  
 17 fair?  
 18 MR. COMERFORD:  
 19 A. We employ our contribution in aid of  
 20 construction policy, so for that particular  
 21 project, we looked at the load base  
 22 investment that would come from the table  
 23 that's within the CIAC policy and that's  
 24 what was used to determine the load base on  
 25 this one.

Page 125

1 CHAIR:  
 2 Q. Because I know there's a lot of discussion  
 3 about, there's the redundant supply, but if  
 4 this additional load had been supplied at  
 5 the other MUN substation, you still would  
 6 have charged no contribution because it  
 7 would have been supported by load growth, is  
 8 that fair?  
 9 MR. COMERFORD:  
 10 A. Yes, that is correct. That additional load  
 11 is supported by load growth.  
 12 CHAIR:  
 13 Q. Okay, that's all my questions. Thank you.  
 14 MR. O'BRIEN:  
 15 Q. I have nothing arising. Nothing arising,  
 16 Mr. Chair.  
 17 MS. GLYNN:  
 18 Q. Well Mr. Chair, I'm surprised that we're  
 19 finished with Mr. Comerford and I think I  
 20 indicated that yesterday that I thought we  
 21 would be most of the day with Mr. Comerford.  
 22 We do have another witness, Mr. Bowman, I  
 23 think we had agreed that we would wait until  
 24 Friday. My only concern is that we would  
 25 want to make sure that we get through Mr.

Page 126

1 Bowman tomorrow, so I don't know if any of  
 2 the parties –  
 3 MR. O'BRIEN:  
 4 Q. I can't imagine I'm going to be more than an  
 5 hour with Mr. Bowman.  
 6 MS. GLYNN:  
 7 Q. So we should have sufficient time.  
 8 MR. O'BRIEN:  
 9 Q. I don't know how long your direct is going  
 10 to be, any idea?  
 11 BROWNE, KC:  
 12 Q. Within an hour for sure.  
 13 MR. O'BRIEN:  
 14 Q. We should be fine with Mr. Bowman tomorrow.  
 15 GREENE, KC:  
 16 Q. And Hydro?  
 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 able to get through Mr. Bowman's testimony  
 25 tomorrow and if that's the case, then I

Page 127

1 think we can adjourn for the day.  
 2 CHAIR:  
 3 Q. I will adjourn for today. See you tomorrow,  
 4 thank you.  
 5 Upon concluding at 12:01 p.m.  
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Page 128

CERTIFICATE

I, Judy Moss, hereby certify that the foregoing is a true and correct transcript of hearing in the matter of Newfoundland Power Inc. 2025-2026 General Rate Application heard on June 27th, 2024 before the Newfoundland and Labrador Board of Commissioners of Public Utilities, 120 Torbay Road, St. John's, Newfoundland and Labrador and was transcribed by me to the best of my ability by means of a sound apparatus.

Dated at St. John's, Newfoundland and Labrador this 27th day of June, 2024

Judy Moss



<p style="text-align: center;"><b>A</b></p> <p><b>Ability</b> - 12:9, 14:2, 91:2, 91:3  <b>Able</b> - 18:4, 86:7, 108:4, 108:8, 110:15, 126:24  <b>Above</b> - 63:24, 64:14  <b>Acceptability</b> - 70:4  <b>Accepted</b> - 70:25  <b>Access</b> - 36:5, 36:14, 36:15, 37:7, 37:9, 38:2, 38:4, 45:9, 45:12, 48:19, 51:16, 52:2  <b>Accessing</b> - 52:4  <b>Accomplish</b> - 47:24  <b>According</b> - 34:13, 108:21  <b>Accordingly</b> - 1:12  <b>Account</b> - 11:7, 13:16  <b>Accountants</b> - 86:5  <b>Achieve</b> - 4:1, 5:4, 7:21, 86:9  <b>Achieved</b> - 77:17, 77:20, 94:19  <b>Achievement</b> - 7:13  <b>Achieves</b> - 71:11  <b>Across</b> - 3:11, 17:2, 20:6, 23:14, 26:20, 82:20, 105:21, 107:21, 108:15  <b>Act</b> - 26:23  <b>Action</b> - 17:17, 27:16, 61:23, 64:13  <b>Activity</b> - 38:25, 39:10, 59:18  <b>Actors</b> - 35:21  <b>Actual</b> - 3:24, 97:17, 100:14, 102:8, 102:17, 102:19, 102:20, 103:15, 103:17, 103:23, 107:11  <b>Adaptation</b> - 14:1, 55:4, 56:4  <b>Add</b> - 20:17  <b>Added</b> - 17:20, 17:25  <b>Addition</b> - 40:1, 40:14, 69:16</p>	<p><b>Additions</b> - 24:18  <b>Address</b> - 17:17, 19:11, 20:13, 23:13, 24:1, 27:16, 70:19  <b>Addressed</b> - 74:1  <b>Addressing</b> - 25:6  <b>Adequacy</b> - 60:6  <b>Adequately</b> - 73:22  <b>Adherence</b> - 73:4  <b>Adjourn</b> - 127:1, 127:3  <b>Adjusted</b> - 6:12, 6:19  <b>Adjusting</b> - 11:6  <b>Adjustments</b> - 27:6, 83:15, 104:1  <b>Administration</b> - 6:11  <b>Adopting</b> - 66:22  <b>Adoption</b> - 16:21, 19:24, 24:8  <b>Advance</b> - 57:14  <b>Adversely</b> - 85:18  <b>Advertised</b> - 76:3  <b>Advise</b> - 44:7  <b>Advised</b> - 43:12  <b>Advocate</b> - 1:6, 67:25, 69:14, 74:11, 74:22, 79:23, 107:10, 114:3, 114:5  <b>Advocate's</b> - 68:10  <b>Affairs</b> - 78:9, 78:15  <b>Affect</b> - 17:5, 22:24, 23:3, 25:7, 87:15, 102:20  <b>Affirmed</b> - 65:17, 65:18  <b>Against</b> - 12:11  <b>Age</b> - 4:10, 28:1  <b>Ages</b> - 4:22  <b>Aging</b> - 4:11  <b>Agree</b> - 5:3, 69:6, 73:19, 108:25  <b>Agreed</b> - 110:24, 125:23  <b>Agreement</b> - 59:1, 59:4, 110:21, 111:6, 111:24, 112:8, 112:11  <b>Agreements</b> - 14:19, 63:17  <b>Ahead</b> - 22:17, 108:11  <b>Aid</b> - 72:1, 72:11, 124:19</p>	<p><b>Align</b> - 84:20, 116:11  <b>Aligned</b> - 88:14, 89:6  <b>Aligning</b> - 97:16  <b>Alleviate</b> - 102:2, 102:7  <b>Allocate</b> - 20:5  <b>Allocates</b> - 72:24  <b>Allow</b> - 15:22, 84:11, 92:2  <b>Alternative</b> - 68:7  <b>Alternatives</b> - 31:24, 47:9, 48:5  <b>Altogether</b> - 23:5  <b>AMI</b> - 118:7  <b>Amongst</b> - 20:22  <b>Amount</b> - 41:17, 58:21, 59:17, 72:18, 95:24, 124:14  <b>Analysis</b> - 22:8, 95:9, 96:17  <b>Annual</b> - 27:8, 28:7, 37:2, 39:10, 101:9, 101:17  <b>Anticipate</b> - 50:1, 126:20  <b>Anticipated</b> - 123:5  <b>Anymore</b> - 47:18  <b>Anyway</b> - 46:3  <b>Appear</b> - 4:13  <b>Appeared</b> - 113:3  <b>Appears</b> - 64:10  <b>Application</b> - 6:14, 30:12, 31:21, 32:9, 46:21, 48:4, 49:24, 60:1, 60:15, 60:21, 63:10, 64:11, 67:2, 70:22, 71:13, 73:4, 80:8, 80:14, 82:8, 82:9, 82:24, 83:11, 84:6, 95:17, 95:18, 104:2, 109:8, 109:11, 110:20, 110:22, 110:23, 111:5, 112:3, 112:25, 113:12  <b>Applications</b> - 60:9, 63:9  <b>Applied</b> - 67:21, 76:5, 83:21, 105:21  <b>Applies</b> - 85:2  <b>Apply</b> - 71:17, 76:2, 87:2, 87:5, 89:19  <b>Applying</b> - 86:10,</p>	<p>87:10  <b>Approach</b> - 26:16, 29:16, 47:5, 106:21  <b>Approaches</b> - 36:4, 45:8  <b>Approaching</b> - 17:3, 31:24  <b>Appropriate</b> - 36:9, 44:5, 68:4, 69:22  <b>Approved</b> - 72:4, 72:7, 73:10, 73:21  <b>Approximately</b> - 59:2  <b>April</b> - 113:4, 115:3  <b>Area</b> - 14:7, 22:3, 36:1, 57:20, 69:7, 118:16  <b>Areas</b> - 13:12, 20:6, 20:8, 20:9, 20:25, 21:16, 22:3, 22:16, 51:15  <b>Aren't</b> - 22:6  <b>Arising</b> - 125:15  <b>ASAP</b> - 1:11  <b>Aspect</b> - 55:15, 93:3  <b>Aspects</b> - 58:14  <b>Assembling</b> - 108:7, 116:19  <b>Assess</b> - 70:3, 107:12  <b>Assessed</b> - 36:1  <b>Assesses</b> - 71:2  <b>Assessing</b> - 70:25  <b>Assessment</b> - 17:16, 28:10, 28:22, 29:8, 36:17  <b>Assessments</b> - 17:1  <b>Asset</b> - 25:19, 25:22, 26:13, 26:14, 26:16, 26:18, 27:20, 31:4, 43:11, 56:19  <b>Assets</b> - 26:20  <b>Assist</b> - 69:15  <b>Assistance</b> - 14:19, 59:13  <b>Assisted</b> - 117:19, 117:21  <b>Associated</b> - 33:14, 60:3, 60:13, 60:19, 97:24, 104:24, 114:14, 121:10  <b>Attachment</b> - 2:17, 33:13, 41:24, 42:5,</p>	<p>50:24  <b>Attention</b> - 51:7  <b>Attributes</b> - 84:16, 84:21, 86:22, 88:1, 92:16, 92:22, 104:10  <b>Audit</b> - 58:15, 58:16  <b>August</b> - 114:4  <b>Automation</b> - 15:17, 66:13, 75:23  <b>Automobiles</b> - 45:21  <b>Aux</b> - 13:21  <b>Available</b> - 93:1, 93:5, 115:9  <b>Average</b> - 3:18, 3:24, 5:6, 5:20, 5:21, 7:17, 10:18, 23:6, 53:15, 53:19, 53:20, 63:24, 67:21, 71:17, 82:20, 118:21, 119:6, 119:9, 119:25  <b>Avoids</b> - 71:12  <b>Awarded</b> - 114:7, 114:15  <b>Aware</b> - 31:7, 118:15, 118:23, 119:11, 119:14, 119:17, 120:8</p> <p style="text-align: center;"><b>B</b></p> <p><b>Bachelor</b> - 75:4  <b>Back</b> - 2:4, 6:20, 9:10, 9:12, 10:6, 14:2, 14:6, 28:4, 41:24, 47:21, 47:22, 61:12, 65:21, 74:22, 87:20, 93:11, 97:2, 97:3, 99:10, 100:2, 114:3, 114:5, 122:8  <b>Background</b> - 34:3, 66:7, 74:24  <b>Backoffice</b> - 46:13  <b>Balance</b> - 91:19  <b>Band</b> - 8:8, 8:22  <b>Base</b> - 77:6, 124:21, 124:24  <b>Based</b> - 4:8, 7:19, 20:9, 23:11, 27:3, 48:10, 48:15, 68:18, 73:14, 88:15, 92:23, 96:17, 110:6</p>
--	--	--	--	--

<p><b>Basic</b> - 69:21, 80:20, 80:23, 81:6, 81:12, 104:8, 104:22  <b>Basis</b> - 6:12, 27:4, 51:24, 52:6, 53:2, 70:25  <b>Basques</b> - 13:21  <b>Became</b> - 66:13, 66:16  <b>Becomes</b> - 4:2  <b>Becoming</b> - 56:5, 83:4, 89:6  <b>Behind</b> - 8:21  <b>Benefit</b> - 43:5, 73:17, 97:19, 99:5, 116:22, 117:25  <b>Benefits</b> - 94:18, 97:6, 97:24, 98:2, 98:8, 98:14, 98:16, 98:20, 101:7, 103:5, 103:6  <b>Bi</b> - 83:1  <b>Big</b> - 13:8, 14:23, 26:21, 92:10, 93:22  <b>Bill</b> - 40:21, 102:18, 102:19  <b>Billing</b> - 116:10  <b>Bills</b> - 102:16, 103:19  <b>Bit</b> - 66:6, 84:17, 85:11, 86:10, 100:10, 100:11, 116:8  <b>Blanket</b> - 106:14  <b>Blind</b> - 106:20  <b>Block</b> - 38:17, 68:22, 68:23, 68:25, 69:2, 70:10, 81:1, 87:9, 88:12, 88:22, 88:24, 89:2, 90:6, 93:13, 93:15, 94:3, 94:9, 94:20, 95:1, 95:20, 95:22, 96:6, 96:8, 97:12, 99:1, 99:3, 99:6, 99:8, 100:23, 101:20, 104:8  <b>Blocking</b> - 104:25  <b>Blocks</b> - 104:1  <b>Blunt</b> - 82:20  <b>Board</b> - 30:7, 63:20, 67:25, 69:13, 70:20, 71:8, 72:5, 73:2, 73:21, 74:2, 82:20, 88:6, 90:17, 105:21,</p>	<p>107:11, 107:21, 112:16, 112:22, 113:24  <b>Board's</b> - 86:23, 88:2  <b>Boilers</b> - 123:3  <b>Bonbright</b> - 91:17  <b>Borne</b> - 110:19  <b>Both</b> - 10:10, 87:2, 89:12, 94:20, 114:22  <b>Bottom</b> - 33:19, 38:9  <b>Bounce</b> - 14:2  <b>Bounds</b> - 102:23  <b>Bowman</b> - 68:11, 68:15, 68:20, 69:1, 69:9, 73:9, 125:22, 126:1, 126:5, 126:14  <b>Bowman's</b> - 69:6, 70:8, 73:14, 126:24  <b>Break</b> - 65:8, 65:10, 99:17, 99:20, 115:7  <b>Breakdown</b> - 34:17, 41:10, 41:16, 42:2, 42:8, 61:1  <b>Brien</b> - 65:13  <b>Broadly</b> - 87:12  <b>Broke</b> - 115:12  <b>Broken</b> - 42:1  <b>Brought</b> - 12:25  <b>BROWNE</b> - 1:8, 126:11  <b>Brush</b> - 52:3, 52:6  <b>Budget</b> - 13:10, 20:14, 30:12, 30:16, 31:20, 48:4, 63:9  <b>Build</b> - 12:13, 12:19  <b>Building</b> - 12:21, 13:1, 21:11, 38:17  <b>Built</b> - 19:22, 21:18, 23:11, 23:21, 51:14  <b>Bundles</b> - 47:22  <b>Business</b> - 42:17, 44:6, 46:13, 64:11, 64:17, 66:11, 75:6  <b>Businesses</b> - 35:19  <b>Buying</b> - 22:6  <b>Buys</b> - 22:22</p>	<table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td style="text-align: center;"><b>C</b></td> </tr> </table> <p><b>Ca</b> - 8:18, 81:16  <b>CACEA</b> - 113:5  <b>Calculation</b> - 5:20, 22:18, 95:20  <b>Call</b> - 3:16, 29:15, 44:12, 45:3  <b>Can</b> - 1:17, 4:14, 4:20, 5:16, 6:2, 8:9, 8:19, 8:20, 8:25, 10:17, 10:22, 14:20, 15:11, 15:12, 15:14, 17:5, 18:3, 18:9, 22:10, 24:1, 31:13, 34:17, 37:9, 39:7, 39:9, 41:17, 42:4, 42:19, 43:4, 44:8, 45:10, 47:2, 51:3, 51:17, 54:21, 55:14, 56:7, 58:7, 63:16, 63:19, 63:23, 64:6, 66:6, 70:19, 71:20, 80:16, 84:8, 86:9, 87:11, 96:21, 97:8, 108:13, 116:21, 127:1  <b>Canadian</b> - 12:14, 118:21, 119:6, 119:8, 119:24  <b>Can't</b> - 18:19, 78:3, 115:21, 126:4  <b>Capabilities</b> - 15:19  <b>Capacity</b> - 20:11, 20:12, 20:18, 21:2, 21:20, 21:25, 70:13, 78:22, 78:23, 91:5, 95:6  <b>Capital</b> - 13:7, 13:10, 19:17, 19:20, 20:1, 20:14, 23:12, 30:12, 30:16, 31:20, 48:3, 63:8  <b>Capture</b> - 51:7  <b>Care</b> - 40:21  <b>Career</b> - 75:11  <b>Careful</b> - 85:17, 87:16, 93:19, 93:25, 94:14  <b>Carefully</b> - 90:9  <b>Carrying</b> - 64:10  <b>Case</b> - 37:25, 90:4, 126:25  <b>Catch</b> - 75:21  <b>Categories</b> - 34:9,</p>	<b>C</b>	<p>42:4, 58:6  <b>Category</b> - 42:20  <b>Cause</b> - 35:23, 55:17, 70:11  <b>Causes</b> - 22:10, 27:25  <b>Causing</b> - 23:24  <b>CC&amp;B</b> - 40:20  <b>Cent</b> - 101:19  <b>Cents</b> - 94:5, 97:12, 97:15, 99:1, 99:2, 101:24, 103:3  <b>Certain</b> - 31:23, 43:9  <b>Certainly</b> - 4:24, 16:7, 30:21, 32:2, 49:13, 49:24, 57:17, 60:5, 64:5, 76:20, 92:7, 93:4, 93:5, 95:3, 96:12, 98:11, 98:14, 99:5, 105:9, 118:6, 126:23  <b>Certainty</b> - 93:8, 115:22  <b>CHAIR</b> - 1:2, 1:9, 1:13, 2:3, 2:7, 64:23, 65:3, 65:12, 65:15, 65:20, 65:23, 74:10, 74:16, 99:15, 99:19, 99:22, 99:25, 100:1, 100:4, 123:17, 123:22, 124:2, 124:3, 124:7, 125:1, 125:12, 125:16, 125:18, 127:2  <b>Chairman</b> - 123:15, 123:21, 124:1  <b>Challenge</b> - 22:4, 22:5, 91:7  <b>Challenges</b> - 11:4, 11:22, 19:7, 52:4, 90:12, 90:19  <b>Challenging</b> - 9:25, 104:21  <b>Change</b> - 16:3, 16:20, 16:25, 17:5, 25:23, 31:18, 35:2, 65:9, 84:11, 85:23, 85:25, 92:17, 94:10, 96:10, 96:19, 98:23, 98:24, 98:25, 99:11, 100:18, 101:12,</p>	<p>101:15, 101:17, 102:14, 102:20, 102:21, 104:12, 104:13, 116:6  <b>Changed</b> - 30:25, 95:7  <b>Changer</b> - 15:6  <b>Changes</b> - 29:16, 29:24, 30:14, 31:19, 41:1, 67:7, 67:14, 67:18, 68:1, 68:11, 68:13, 69:9, 69:16, 69:19, 69:20, 69:22, 69:24, 70:4, 70:5, 70:14, 73:19, 81:23, 82:10, 82:13, 85:15, 85:17, 86:11, 87:14, 90:5, 96:17, 97:13, 98:5, 98:18, 101:10, 103:8, 110:5, 110:6, 111:1, 111:2  <b>Changing</b> - 68:18, 83:7, 98:9, 98:20, 99:12, 99:13, 103:3, 115:16  <b>Characterize</b> - 4:6, 4:19, 4:24  <b>Charge</b> - 68:21, 68:22, 72:21, 80:20, 80:21, 80:22, 80:23, 81:6, 81:12, 90:25, 93:14, 93:16, 95:21, 95:23, 96:7, 96:9, 99:1, 99:4, 104:23, 104:24  <b>Charged</b> - 99:14, 125:6  <b>Charger</b> - 22:23  <b>Charges</b> - 69:21, 80:24, 80:25, 81:1, 81:2, 89:24, 95:2, 95:3, 95:7, 98:13, 104:8, 104:9  <b>Chart</b> - 6:2, 6:10, 6:23  <b>Charts</b> - 14:11  <b>Check</b> - 34:1  <b>Checking</b> - 33:24  <b>Checklists</b> - 14:8  <b>CHIEF</b> - 65:18  <b>Christensen</b> - 113:4, 113:8, 114:8, 114:11, 114:15,</p>
<b>C</b>					

<p>114:25, 115:13  <b>CHUBB</b> - 39:17  <b>Chubbs</b> - 2:8, 2:9, 3:1, 3:8, 3:20, 4:5, 5:5, 5:13, 5:18, 6:15, 6:25, 7:6, 7:14, 10:15, 11:9, 11:14, 11:18, 12:3, 16:6, 16:10, 16:23, 18:12, 19:1, 19:14, 23:19, 24:24, 25:9, 25:25, 26:8, 28:12, 28:18, 29:1, 29:5, 29:11, 29:20, 30:1, 30:20, 32:12, 32:13, 32:23, 33:8, 33:16, 33:25, 34:20, 35:1, 35:11, 36:23, 37:17, 40:3, 40:17, 41:19, 42:24, 45:22, 46:2, 47:4, 48:12, 49:20, 51:10, 54:6, 54:11, 54:16, 54:24, 55:9, 56:17, 58:11, 59:6, 62:4, 62:22, 64:16, 64:21, 65:9, 117:24, 118:19, 120:12  <b>Chubbs'</b> - 120:6  <b>Chuckle</b> - 55:1  <b>Churchill</b> - 17:24  <b>CIAC</b> - 73:12, 124:23  <b>CIAC's</b> - 72:19  <b>Circulated</b> - 115:2  <b>CIS</b> - 40:21, 40:23, 49:1, 49:6  <b>Class</b> - 71:4, 71:5, 71:15, 72:25, 81:20, 90:20  <b>Classes</b> - 67:22, 69:23, 71:18, 85:13, 87:7, 88:23, 89:13  <b>Cleared</b> - 53:4  <b>Clearing</b> - 55:16, 55:21  <b>Clicks</b> - 36:12  <b>Climate</b> - 14:1, 16:3, 16:20, 16:25, 17:5, 55:3, 56:4  <b>Close</b> - 78:5  <b>Closer</b> - 95:25  <b>Cloud</b> - 48:10, 48:13, 48:15, 48:17, 48:23, 49:2, 49:7, 49:12</p>	<p><b>Coast</b> - 13:21  <b>Coastal</b> - 13:12, 13:19, 13:22, 17:9, 17:13  <b>Collected</b> - 71:4  <b>Collection</b> - 29:17  <b>Come</b> - 3:11, 59:3, 82:4, 97:2, 124:22  <b>Comerford</b> - 65:16, 65:18, 65:23, 66:1, 66:2, 66:9, 66:21, 67:10, 67:13, 67:16, 68:10, 68:14, 69:5, 69:8, 70:18, 70:23, 71:23, 73:8, 73:13, 73:20, 74:4, 74:6, 74:13, 74:17, 74:18, 75:2, 75:10, 75:22, 76:4, 76:14, 76:19, 77:1, 77:7, 77:12, 77:19, 78:2, 78:10, 78:14, 78:19, 79:1, 79:5, 79:14, 79:18, 80:5, 80:18, 81:7, 81:13, 81:25, 82:6, 82:15, 82:22, 83:20, 83:25, 84:18, 86:2, 87:4, 88:10, 88:20, 89:14, 89:22, 90:23, 91:12, 92:6, 93:18, 94:22, 96:2, 96:11, 96:16, 97:9, 98:1, 98:7, 98:22, 100:4, 100:9, 100:16, 101:4, 101:14, 103:1, 103:24, 104:18, 105:8, 105:18, 106:4, 106:22, 107:23, 108:17, 109:1, 109:22, 110:16, 111:19, 112:1, 112:9, 112:20, 113:7, 113:13, 113:19, 114:12, 114:20, 117:3, 117:14, 117:20, 118:4, 118:14, 119:1, 119:10, 119:16, 120:5, 120:16, 120:22, 121:7, 121:14, 121:22, 122:2, 122:10, 122:14, 122:22,</p>	<p>123:7, 123:11, 124:18, 125:9, 125:19, 125:21  <b>Comes</b> - 9:10, 14:1, 15:2, 24:12, 57:10, 71:21, 83:7, 95:10, 115:25  <b>Coming</b> - 1:16, 25:12, 38:20, 40:24, 98:19  <b>Commence</b> - 112:7  <b>Commenced</b> - 110:18, 111:7, 112:7  <b>Comment</b> - 64:9  <b>Comments</b> - 114:3, 115:19  <b>COMMISSIONER</b> - 65:1, 124:5  <b>Common</b> - 120:3  <b>Communicate</b> - 18:16  <b>Communications</b> - 14:14, 38:6  <b>Companies</b> - 39:5, 44:24, 46:5, 85:7  <b>Company</b> - 8:6, 31:11, 34:10, 34:22, 34:25, 35:4, 40:10, 40:25, 57:22, 58:7, 58:12, 58:20, 59:20, 61:3, 67:20, 69:11, 70:15, 71:17, 71:20, 92:3  <b>Company's</b> - 66:19, 66:25, 68:12, 70:2, 70:21, 72:25, 73:3, 73:10, 76:18  <b>Compare</b> - 26:25  <b>Compared</b> - 12:17, 44:17, 47:16, 85:19  <b>Comparing</b> - 46:11, 71:3  <b>Comparison</b> - 84:23, 96:22  <b>Compensated</b> - 10:3  <b>Compensation</b> - 76:18, 76:23  <b>Compensatory</b> - 124:16  <b>Complete</b> - 8:6, 111:10  <b>Completed</b> - 28:14, 52:10, 53:12, 55:13, 69:12, 79:13, 109:4, 123:12</p>	<p><b>Completes</b> - 109:2  <b>Completing</b> - 67:24, 84:2, 111:20  <b>Completion</b> - 7:22, 107:25, 117:5  <b>Complicated</b> - 110:14  <b>Component</b> - 13:8, 40:19, 52:24, 77:2, 104:24, 105:4, 116:11  <b>Components</b> - 12:6, 40:9, 40:18, 77:22, 80:3, 80:13, 80:17, 81:5, 81:11, 83:22, 104:7, 105:22, 106:12, 108:15, 110:13  <b>Comprehensive</b> - 70:7, 70:15, 105:14, 106:16, 107:19, 108:9, 108:16, 108:19, 108:23, 108:25, 109:3, 109:6, 109:8, 109:10, 109:14, 109:15, 115:10, 116:21  <b>Comprehensively</b> - 68:5  <b>Compromised</b> - 38:1  <b>Computing</b> - 41:25, 46:17  <b>Concern</b> - 24:10, 125:24  <b>Concerns</b> - 23:25  <b>Conclude</b> - 74:4, 108:13, 111:17  <b>Concludes</b> - 118:11  <b>Concluding</b> - 127:5  <b>Conclusion</b> - 118:25, 119:2, 119:4, 119:15, 120:1  <b>Conditions</b> - 4:20, 5:1, 12:10, 12:16, 13:6, 15:7  <b>Conducting</b> - 70:16, 79:21, 83:14, 95:12  <b>Confident</b> - 57:2  <b>Connecting</b> - 36:15  <b>Connections</b> - 21:9</p>	<p><b>Conscious</b> - 107:7  <b>Consequences</b> - 70:8  <b>Consider</b> - 46:22, 87:13, 92:14, 92:24, 111:4, 115:4, 122:24  <b>Consideration</b> - 57:18, 94:1  <b>Considerations</b> - 83:19  <b>Considered</b> - 4:17, 16:21, 31:25, 48:9, 48:13, 56:10, 69:18, 69:24, 82:23  <b>Considering</b> - 18:14  <b>Consistent</b> - 84:14, 86:20, 86:22, 87:24, 88:1, 118:22, 119:6, 119:25  <b>Constant</b> - 62:7, 63:22  <b>Constantly</b> - 64:18  <b>Constrained</b> - 70:13  <b>Construction</b> - 72:2, 72:11, 124:20  <b>Consultant</b> - 35:25, 40:11, 69:15  <b>Consultants</b> - 39:13, 58:13, 59:8, 59:10, 113:5  <b>Consultant's</b> - 113:3  <b>Consultation</b> - 30:6, 30:11, 69:13  <b>Consultations</b> - 31:8  <b>Consulting</b> - 36:22, 39:15, 40:2, 40:15, 40:19, 41:16, 44:4, 46:20, 112:15  <b>Consume</b> - 99:6, 99:7  <b>Consumed</b> - 102:4  <b>Consumer</b> - 1:6, 67:25, 68:10, 69:13, 74:11, 74:22, 79:23, 107:10, 114:3, 114:5  <b>Consumers'</b> - 119:7  <b>Contact</b> - 52:12, 53:5  <b>Contacting</b> - 21:11,</p>
--	---	--	--	---

<p>51:19, 53:1, 53:22, 63:5  <b>Context</b> - 101:17  <b>Continual</b> - 26:25, 27:17  <b>Continually</b> - 63:13  <b>Continue</b> - 7:10, 8:23, 8:24, 11:25, 49:18, 50:2, 50:16  <b>Continued</b> - 48:2, 62:23, 63:7  <b>Contract</b> - 40:22  <b>Contracted</b> - 39:1  <b>Contracts</b> - 63:18  <b>Contributing</b> - 33:5  <b>Contribution</b> - 72:1, 72:9, 72:11, 121:15, 121:20, 121:24, 122:15, 124:19, 125:6  <b>Contributions</b> - 67:5  <b>Control</b> - 7:11, 9:22, 11:5, 15:19  <b>Controls</b> - 66:12, 75:23  <b>Conversation</b> - 62:7, 63:22  <b>Conversations</b> - 30:22  <b>Conversion</b> - 23:17, 58:19  <b>Conversions</b> - 19:24, 24:5  <b>Corporate</b> - 2:19, 5:10, 6:5, 36:8  <b>Corrective</b> - 13:9  <b>Cost</b> - 6:3, 6:7, 6:12, 21:12, 32:17, 34:8, 34:19, 34:22, 36:19, 40:10, 40:11, 41:8, 44:8, 44:23, 45:4, 46:5, 48:3, 49:12, 50:18, 51:22, 52:19, 52:24, 53:17, 55:18, 56:10, 57:1, 57:3, 57:4, 57:9, 57:20, 61:9, 61:18, 61:20, 63:11, 63:13, 63:14, 63:15, 63:19, 63:23, 64:13, 64:19, 66:24, 66:25, 67:3, 67:18, 68:18, 70:19, 70:20, 70:24, 71:4, 71:6,</p>	<p>71:9, 71:12, 71:14, 72:2, 72:23, 73:1, 73:11, 83:7, 84:12, 86:20, 88:16, 90:14, 92:18, 92:22, 93:15, 94:19, 95:22, 95:24, 96:8, 96:13, 96:25, 97:17, 98:6, 98:9, 100:13, 102:15, 103:14, 103:16, 103:17, 106:24, 107:1, 107:2, 110:6, 112:14, 117:25, 118:8, 118:13, 118:22, 119:7, 119:25, 121:16  <b>Costed</b> - 86:18, 97:14  <b>Costing</b> - 101:23  <b>Costly</b> - 109:9  <b>Costs</b> - 6:20, 7:12, 9:6, 9:7, 9:13, 9:21, 9:24, 10:12, 10:14, 11:6, 11:22, 19:5, 25:18, 28:3, 32:7, 32:11, 32:21, 33:4, 33:6, 33:14, 35:3, 42:6, 42:9, 42:13, 49:18, 50:15, 51:1, 59:15, 62:1, 64:5, 68:17, 69:3, 69:17, 72:25, 80:11, 83:8, 83:9, 84:4, 84:21, 91:2, 91:5, 92:9, 92:23, 93:7, 93:17, 93:21, 93:23, 93:24, 94:12, 95:5, 95:6, 95:19, 96:10, 97:19, 100:15, 100:22, 101:8, 102:2, 102:9, 102:13, 103:4, 103:7, 103:23, 104:13, 104:21, 108:3, 109:21, 110:2, 110:4, 110:5, 110:7, 115:17, 115:22, 116:5, 116:12, 121:10, 124:15  <b>Couldn't</b> - 115:20, 116:16  <b>Couple</b> - 10:1, 19:21, 28:24, 43:10, 44:10,</p>	<p>44:20, 51:1, 77:18  <b>Course</b> - 8:4, 9:4, 30:7, 79:22, 82:13, 85:5, 86:12, 91:16, 91:19, 107:24  <b>Covered</b> - 12:5  <b>COVID</b> - 50:12  <b>Create</b> - 94:6  <b>Created</b> - 101:25  <b>Crew</b> - 15:9  <b>Crews</b> - 15:22, 47:14, 47:23, 51:17  <b>Criteria</b> - 118:13  <b>Critical</b> - 43:21, 48:17, 48:24  <b>Cross</b> - 71:12, 74:13  <b>CSA</b> - 12:18  <b>Current</b> - 31:4, 32:18, 44:15, 78:23, 96:1, 97:6, 97:10, 97:24, 112:3  <b>Currently</b> - 28:11, 28:22, 67:23, 76:11, 79:6, 79:17, 79:21, 83:13, 84:1, 95:11, 105:19, 110:19  <b>Customer</b> - 3:7, 6:4, 6:7, 9:2, 14:14, 19:9, 19:25, 21:8, 21:10, 22:1, 22:22, 38:2, 38:6, 40:20, 52:11, 52:18, 53:18, 54:22, 67:4, 67:21, 67:22, 68:25, 69:19, 69:21, 69:23, 69:25, 70:3, 70:4, 70:5, 71:3, 71:18, 72:8, 72:10, 72:13, 72:22, 72:25, 73:17, 80:11, 80:20, 80:23, 84:25, 85:18, 86:11, 87:16, 88:23, 92:3, 93:21, 94:2, 94:4, 94:7, 94:8, 94:15, 97:6, 97:23, 98:11, 98:17, 99:10, 101:2, 102:18, 104:9, 104:22, 106:25, 117:6  <b>Customers</b> - 8:3, 8:7, 8:14, 8:25, 14:6, 18:9, 18:15, 18:17, 18:18, 22:6, 22:21, 22:25, 23:3, 50:6, 52:12, 53:22,</p>	<p>61:15, 63:4, 63:15, 63:21, 64:7, 64:19, 68:8, 68:20, 70:1, 71:15, 71:21, 71:25, 72:15, 73:5, 73:23, 80:19, 80:22, 85:14, 85:15, 86:20, 86:25, 87:8, 87:15, 88:4, 88:7, 88:14, 89:25, 90:10, 90:21, 90:25, 91:16, 97:20, 98:10, 98:12, 99:4, 99:7, 99:12, 100:13, 101:1, 101:5, 101:6, 102:13, 103:5, 103:7, 103:14, 104:3, 104:25, 105:11, 107:14, 108:10, 109:25, 116:22  <b>Customer's</b> - 52:16, 102:18  <b>Customizations</b> - 49:9  <b>Cut</b> - 52:5  <b>Cyber</b> - 34:18, 34:21, 35:4, 35:15, 35:16, 35:18, 37:20, 45:2, 45:4, 45:14, 45:20, 46:9, 50:11, 59:21  <b>Cycle</b> - 54:4, 56:13</p> <div style="border: 1px solid black; text-align: center; width: fit-content; margin: 10px auto;"> <p><b>D</b></p> </div> <p><b>Darknl</b> - 31:13  <b>Data</b> - 4:3, 17:21, 27:5, 29:17, 38:2, 38:4  <b>Database</b> - 119:15  <b>Date</b> - 1:25, 2:1, 2:2, 43:9, 123:10, 123:13  <b>Dates</b> - 1:10  <b>Day</b> - 45:16, 125:21, 127:1  <b>Days</b> - 4:18, 17:24  <b>Deal</b> - 22:10  <b>Dealing</b> - 16:13, 16:20, 35:19  <b>Decade</b> - 14:25, 31:12, 62:10  <b>December</b> - 43:13, 43:17, 112:17, 113:24</p>	<p><b>Decided</b> - 80:7  <b>Decision</b> - 105:4, 107:7, 107:13, 107:17, 107:20, 108:14, 108:24, 119:21  <b>Decline</b> - 11:25  <b>Declining</b> - 68:25, 88:24, 90:2, 90:6  <b>Decrease</b> - 57:4  <b>Deferred</b> - 62:1  <b>Definitely</b> - 48:13, 58:3  <b>Degree</b> - 21:6, 23:23, 75:5, 93:24  <b>Degrees</b> - 77:21  <b>Delay</b> - 114:18  <b>Delivers</b> - 27:17  <b>Demand</b> - 19:9, 44:21, 69:21, 70:11, 80:24, 81:12, 89:24, 90:25, 95:3, 95:6, 104:8, 104:24, 110:4, 110:5, 110:6, 110:7  <b>Department</b> - 82:5  <b>Depreciation</b> - 60:18  <b>Depression</b> - 58:18  <b>Derive</b> - 108:22  <b>Derived</b> - 108:23  <b>Described</b> - 47:15  <b>Design</b> - 12:12, 66:24, 67:24, 69:7, 69:11, 69:12, 69:16, 70:1, 70:14, 71:11, 79:12, 79:22, 81:19, 81:23, 82:19, 83:10, 83:14, 83:19, 83:24, 84:2, 90:16, 92:5, 94:13, 94:23, 95:10, 104:4, 104:6, 105:12, 105:15, 105:20, 107:8, 107:11, 107:14, 107:15, 107:25, 108:7, 109:3, 110:18, 111:1, 111:2, 111:6, 111:15, 111:20, 112:7, 112:12, 112:21, 113:22, 114:22, 115:1, 115:4, 115:7, 115:25, 116:20, 117:4, 117:13</p>
--	---	---	---	---

<p><b>Designed</b> - 16:2, 49:5, 78:24, 79:4, 79:8  <b>Designing</b> - 13:14, 49:6, 93:1  <b>Designs</b> - 13:13, 17:20, 67:3, 67:14, 67:18, 68:5, 68:7, 68:12, 68:16, 69:10, 69:20, 69:25, 70:5, 70:6, 79:6, 82:11, 83:16, 85:16, 87:14, 92:4, 98:13, 108:11, 109:5  <b>Detached</b> - 83:18  <b>Detailed</b> - 112:14, 120:7, 120:8  <b>Deteriorating</b> - 3:25  <b>Deterioration</b> - 3:13  <b>Determine</b> - 56:22, 72:8, 72:12, 72:20, 124:16, 124:24  <b>Determined</b> - 42:20, 42:23, 71:6  <b>Determines</b> - 72:24  <b>Develop</b> - 27:15, 41:5  <b>Developed</b> - 16:19, 86:7  <b>Developing</b> - 16:22, 82:24  <b>Development</b> - 26:19  <b>Didn't</b> - 7:5, 50:1, 75:21, 103:16, 109:13, 115:9, 116:17  <b>Dies</b> - 53:4  <b>Difference</b> - 93:22, 102:6  <b>Different</b> - 18:7, 21:2, 21:3, 22:8, 38:22, 39:13, 45:8, 58:5, 58:14, 77:22, 85:11, 86:10, 87:7, 94:10, 110:9, 116:9  <b>Difficult</b> - 90:15  <b>Diminish</b> - 97:18  <b>Directed</b> - 112:22  <b>Direction</b> - 31:10, 105:6, 105:9  <b>Directive</b> - 106:13  <b>Directly</b> - 20:19  <b>Director</b> - 66:3,</p>	<p>66:16, 76:12, 76:20  <b>Directors</b> - 2:22, 76:24  <b>Discriminatory</b> - 73:25  <b>Discussing</b> - 1:14  <b>Discussions</b> - 1:15, 32:4  <b>Dispatch</b> - 15:14  <b>Dispatches</b> - 47:14  <b>Dispatching</b> - 47:22  <b>Displayed</b> - 8:17  <b>Disruption</b> - 35:23  <b>Distills</b> - 103:18  <b>Distortion</b> - 102:11, 103:20  <b>Distribution</b> - 12:13, 13:15, 15:20, 20:4, 20:24, 22:14, 22:15, 22:20, 51:13, 54:3  <b>Document</b> - 112:19, 118:10  <b>Documentation</b> - 26:22, 26:23, 26:24, 27:22  <b>Doesn't</b> - 13:17, 22:23, 44:14, 57:15, 69:5, 106:1  <b>Dollar</b> - 120:13  <b>Dollars</b> - 20:23, 59:2  <b>Domestic</b> - 68:20, 70:9, 80:19, 81:5, 81:19, 89:13, 89:15, 89:19, 89:23, 89:25, 90:2, 90:5, 90:19, 90:21, 90:24, 91:3, 104:17, 104:19, 104:20, 104:25, 105:1, 106:11  <b>Don't</b> - 4:6, 10:6, 11:25, 12:24, 17:12, 24:16, 26:1, 26:11, 34:3, 41:7, 42:14, 46:1, 50:14, 52:19, 55:19, 93:3, 96:21, 105:25, 106:9, 106:23, 109:6, 119:22, 126:1, 126:9, 126:20  <b>Doubled</b> - 35:9  <b>Draw</b> - 96:22  <b>Driven</b> - 51:23, 52:11, 53:11</p>	<p><b>Driver</b> - 46:3, 46:4, 53:16  <b>Drivers</b> - 51:21, 53:8, 59:20  <b>Driving</b> - 44:23, 45:1, 46:4, 55:11, 55:14  <b>Drop</b> - 94:3  <b>Due</b> - 32:11, 40:4  <b>Dynamics</b> - 68:19, 83:8</p> <div style="border: 1px solid black; text-align: center; width: fit-content; margin: 10px auto;"> <p><b>E</b></p> </div> <p><b>Each</b> - 3:13, 6:7, 7:3, 34:9, 36:18, 41:17, 42:6, 42:15, 42:20, 61:4, 71:4, 71:15, 72:25, 80:3, 85:12, 105:4, 105:5  <b>Earlier</b> - 2:17, 19:6, 26:3, 104:20  <b>Early</b> - 17:10, 31:3  <b>Easier</b> - 4:1, 4:7, 4:25  <b>Easily</b> - 1:23  <b>Easy</b> - 49:8  <b>Economy</b> - 64:3  <b>Educated</b> - 26:12  <b>Educational</b> - 74:24  <b>Effect</b> - 88:25, 96:24, 106:2  <b>Effective</b> - 9:1, 16:12, 31:25, 56:15  <b>Effectively</b> - 42:25, 43:22, 83:4, 83:9, 84:4, 89:3, 97:14, 99:2, 111:13  <b>Effectiveness</b> - 91:22  <b>Efficiency</b> - 62:6, 62:12, 62:24, 63:3, 91:18, 91:20  <b>Efficient</b> - 9:1  <b>Electric</b> - 16:19, 16:25, 18:25, 19:24, 20:21, 21:21, 21:23, 22:7, 23:8, 23:23, 78:24, 123:2  <b>Electrical</b> - 20:20, 72:14  <b>Electricity</b> - 20:6, 23:16, 38:3, 68:19, 70:11, 70:13, 72:17, 83:3, 99:8  <b>Electrification</b> - 19</p>	<p>:5, 19:10, 19:12, 19:16, 19:20, 19:22, 20:19, 21:3, 21:15, 23:13, 24:20, 25:4, 25:6  <b>Electronically</b> - 15:14, 47:13  <b>Element</b> - 37:20, 63:1  <b>Eliminate</b> - 97:20  <b>Elsewhere</b> - 14:22  <b>Email</b> - 36:11  <b>Embedded</b> - 70:20, 83:8, 93:7, 93:23, 108:3, 116:4  <b>Emergency</b> - 14:17  <b>Employ</b> - 124:19  <b>Employed</b> - 75:16, 75:18  <b>Employee</b> - 27:19, 36:12, 59:13  <b>EMS</b> - 14:17  <b>Encompass</b> - 92:16  <b>Encrypted</b> - 38:3  <b>Endpoint</b> - 26:11  <b>Ends</b> - 1:21  <b>Energy</b> - 68:17, 68:21, 68:22, 69:17, 70:10, 75:15, 80:21, 80:25, 81:2, 81:6, 81:12, 87:10, 88:13, 89:16, 90:3, 91:2, 92:18, 93:13, 93:15, 93:21, 93:23, 95:1, 95:4, 95:5, 95:19, 95:21, 95:23, 96:6, 96:8, 96:13, 96:19, 96:24, 97:14, 99:1, 99:3, 99:6, 100:22, 101:22, 101:23, 102:3, 104:23, 109:9, 113:5  <b>Engage</b> - 112:11  <b>Engaged</b> - 69:15, 113:6, 113:8, 113:16  <b>Engagement</b> - 70:3, 117:6  <b>Engineer</b> - 66:10, 66:13, 75:24  <b>Engineering</b> - 46:14, 59:8, 59:9, 66:14, 75:5, 75:12  <b>Engineers</b> - 13:13</p>	<p><b>Enhancements</b> - 63:10  <b>Ensure</b> - 51:17, 73:22  <b>Ensures</b> - 71:20, 71:24, 73:5  <b>Ensuring</b> - 30:8, 37:21  <b>Entire</b> - 102:22  <b>Entitled</b> - 77:10, 77:14  <b>Environmental</b> - 27:2  <b>Equally</b> - 98:20  <b>Equipment</b> - 4:13, 36:16, 41:25, 46:17  <b>Equivalent</b> - 44:12, 44:16  <b>Era</b> - 116:24  <b>Erosion</b> - 13:12, 13:19, 13:23, 17:9, 17:13  <b>Essentially</b> - 23:10  <b>Establish</b> - 86:6  <b>Established</b> - 110:21  <b>Establishment</b> - 122:16  <b>Estimate</b> - 22:18, 23:7, 60:22, 110:15, 112:15, 124:14  <b>EV</b> - 22:19  <b>Evaluate</b> - 2:14, 47:9  <b>Evaluated</b> - 47:18, 47:20  <b>Evaluating</b> - 63:14, 68:6  <b>Evaluation</b> - 49:13  <b>Events</b> - 4:16, 7:24, 11:8, 14:15, 15:2, 16:14, 18:11, 18:18, 31:17  <b>Eventually</b> - 21:24, 22:2  <b>Everyone</b> - 1:3, 14:3, 14:4, 17:22, 42:14, 115:6  <b>Everything</b> - 15:9, 64:6  <b>Evidence</b> - 66:19, 66:23, 66:25, 67:8, 70:18, 74:2, 95:16, 108:21, 120:7  <b>Evs</b> - 22:22, 23:9, 24:6  <b>EXAMINATION</b> - 6</p>
---	--	--	--	--

<p>5:18, 74:13  <b>Example</b> - 3:6, 8:19, 9:12, 17:18, 18:24, 26:9, 42:10, 47:11, 48:24, 58:15, 70:8, 90:7, 94:3, 106:15, 110:3  <b>Examples</b> - 43:10  <b>Exceeded</b> - 61:10  <b>Exclude</b> - 4:16  <b>Excluding</b> - 124:15  <b>Executive</b> - 27:9, 76:18, 76:21  <b>Executives</b> - 2:21  <b>Exercises</b> - 14:10  <b>Exhibits</b> - 67:9  <b>Expand</b> - 84:16  <b>Expansion</b> - 124:9  <b>Expect</b> - 17:12, 44:9, 47:2, 57:3, 117:1  <b>Expectation</b> - 60:8  <b>Expected</b> - 59:24, 111:10  <b>Expects</b> - 90:17  <b>Experience</b> - 4:9, 4:15, 109:19  <b>Experienced</b> - 8:15, 9:16, 21:6, 49:22, 63:24  <b>Experiencing</b> - 50:13, 101:20  <b>Expert</b> - 60:4, 60:20, 68:11, 114:19  <b>Expertise</b> - 35:25, 59:9  <b>Experts</b> - 58:17, 58:18  <b>Explain</b> - 5:16, 34:14, 42:16, 71:20, 97:8  <b>Explained</b> - 3:17, 41:14  <b>Explanation</b> - 39:23, 114:18  <b>Explanations</b> - 32:17, 33:1  <b>Extent</b> - 80:6  <b>External</b> - 5:1, 35:24, 40:11, 58:13, 59:16  <b>Externally</b> - 38:7  <b>Extreme</b> - 11:3, 11:7, 12:7, 12:10, 13:6</p>	<table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td style="text-align: center;"><b>F</b></td> </tr> </table> <p><b>Facilities</b> - 72:9, 73:16, 73:17  <b>Facility</b> - 30:9  <b>Facing</b> - 19:7  <b>Factors</b> - 69:18, 91:21, 104:11, 108:5, 110:9  <b>Failures</b> - 4:13  <b>Fair</b> - 59:17, 73:24, 106:23, 107:17, 124:17, 125:8  <b>Fairly</b> - 12:5, 71:21, 73:6  <b>Fairness</b> - 71:2, 71:11, 71:24  <b>Fall</b> - 4:18, 10:21, 57:15  <b>Fallout</b> - 111:23  <b>Falls</b> - 17:24, 27:13, 53:4, 53:5, 68:3, 80:10, 83:5, 88:15, 116:23  <b>Far</b> - 33:1  <b>Fashion</b> - 55:20  <b>Faster</b> - 54:23, 56:14  <b>February</b> - 43:19  <b>Fee</b> - 36:22, 40:7, 40:10, 40:15, 40:19, 41:17, 47:16, 58:20, 61:4  <b>Feedback</b> - 114:6, 117:7  <b>Feeder</b> - 20:4  <b>Feeding</b> - 22:2  <b>Feel</b> - 52:20, 56:23, 119:23  <b>Fees</b> - 34:11, 34:22, 34:25, 35:4, 39:15, 40:2, 41:16, 44:3, 45:1, 46:20, 57:22, 58:5, 58:7, 58:12, 58:16, 59:3, 59:12, 59:13, 59:20, 59:23, 60:3, 60:4, 60:5, 60:12, 60:20, 60:22, 61:3  <b>Felt</b> - 31:10  <b>Field</b> - 47:23  <b>Figure</b> - 10:7, 10:8, 10:10  <b>File</b> - 59:24, 112:14  <b>Filed</b> - 25:24, 67:8, 70:21, 71:13, 74:2, 95:16, 112:16, 113:22, 113:23</p>	<b>F</b>	<p><b>Final</b> - 1:9, 117:2  <b>Finally</b> - 70:5  <b>Find</b> - 45:10  <b>Finding</b> - 28:1, 55:12  <b>Fine</b> - 126:14  <b>Fiona</b> - 13:20, 16:15, 17:15, 56:1  <b>Firewalls</b> - 36:9, 37:12  <b>Firm</b> - 75:12  <b>First</b> - 6:22, 12:8, 31:3, 34:10, 34:18, 34:25, 47:1, 47:9, 51:7, 51:22, 52:15, 68:23, 81:1, 87:20, 93:12, 99:3, 99:17, 114:10, 115:12  <b>Fishing</b> - 36:10  <b>FITZGERALD</b> - 113:10  <b>Fitzgerald</b> - 61:14, 62:17, 74:12, 74:14, 74:15, 74:20, 74:21, 75:7, 75:19, 75:25, 76:10, 76:16, 76:22, 77:5, 77:9, 77:15, 77:24, 78:6, 78:12, 78:17, 78:21, 79:3, 79:10, 79:16, 79:25, 80:15, 81:3, 81:9, 81:15, 82:3, 82:12, 82:17, 83:17, 83:23, 84:7, 85:20, 86:13, 87:18, 88:17, 89:11, 89:17, 90:11, 91:6, 91:24, 93:10, 94:17, 95:14, 96:5, 96:14, 97:1, 97:22, 98:4, 98:15, 99:16, 99:18, 100:2, 100:3, 100:25, 101:11, 102:5, 103:11, 104:16, 105:2, 105:13, 105:23, 106:7, 107:16, 108:12, 108:20, 109:16, 110:12, 111:16, 111:22, 112:5, 112:18, 113:2, 113:15, 114:9, 114:17, 116:25, 117:9, 117:18,</p>	<p>117:23, 118:9, 118:18, 119:3, 119:13, 119:19, 120:10, 120:18, 121:3, 121:11, 121:18, 121:25, 122:5, 122:12, 122:19, 123:4, 123:9, 123:14  <b>Five</b> - 3:18, 4:8, 5:6, 5:20, 5:22, 7:17, 10:18, 20:16, 20:25, 24:17, 25:3, 25:13, 25:14, 25:16, 35:15, 36:25, 75:12, 75:15, 80:12, 99:2  <b>Flat</b> - 68:21, 80:21, 89:16, 90:3, 104:23  <b>Flood</b> - 13:11, 13:17, 17:19  <b>Flooding</b> - 13:18, 17:18  <b>Flow</b> - 61:19  <b>Fluctuate</b> - 4:23  <b>Focus</b> - 13:25, 15:22, 28:5, 31:1, 35:14, 62:23, 63:7, 110:4  <b>Focused</b> - 26:24, 71:8  <b>Focusing</b> - 64:18  <b>Folks</b> - 37:6  <b>Follow</b> - 70:14, 107:24  <b>Following</b> - 31:6, 71:25, 109:10, 111:14  <b>Forecast</b> - 9:15, 19:23, 19:25, 20:4, 20:5, 23:8, 23:22, 33:21, 39:15, 39:22, 59:3, 61:5  <b>Forecasted</b> - 51:5  <b>Forecasting</b> - 9:13, 9:17  <b>Foresee</b> - 30:12  <b>Foresees</b> - 30:5  <b>Forested</b> - 51:15  <b>Forms</b> - 19:25  <b>Forward</b> - 13:2, 31:20, 44:9, 108:8, 113:12  <b>Found</b> - 67:1, 76:6  <b>Four</b> - 23:3, 94:5  <b>Framework</b> - 85:6, 85:8, 86:7, 92:21,</p>	<p>100:18, 100:21, 112:14, 112:22, 113:24  <b>Frequent</b> - 4:22, 46:6  <b>Frequently</b> - 56:24, 57:6  <b>Friday</b> - 125:24  <b>Full</b> - 27:9, 77:25, 92:19, 93:20, 121:16, 121:23  <b>Fully</b> - 13:1, 72:16, 93:24, 111:10  <b>Further</b> - 1:15, 55:18, 69:2, 85:21, 86:16, 87:21  <b>Future</b> - 11:25, 49:7, 49:11, 57:15, 92:13, 93:7, 103:8, 116:5, 116:22</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <tr> <td style="text-align: center;"><b>G</b></td> </tr> </table> <p><b>Gain</b> - 45:12  <b>Gained</b> - 38:1  <b>Gaining</b> - 36:14  <b>Game</b> - 15:5  <b>GDP</b> - 9:14, 9:17, 64:2  <b>General</b> - 6:13, 16:4, 20:20, 24:1, 60:1, 68:24, 72:19, 73:3, 80:7, 80:14, 80:22, 81:10, 82:8, 82:24, 83:10, 84:19, 88:13, 88:23, 89:13, 89:15, 94:4, 94:7, 95:1, 104:2, 104:3, 104:14, 109:7, 109:11, 110:20, 110:22, 110:23, 111:4, 112:2, 112:24, 113:11  <b>Generally</b> - 25:10, 70:24  <b>Generation</b> - 60:9  <b>Geographical</b> - 17:25  <b>Get</b> - 8:21, 8:23, 13:17, 14:5, 14:13, 15:11, 15:16, 21:24, 25:18, 27:21, 34:6, 36:7, 39:7, 43:4, 55:12, 76:9, 76:11, 85:8, 85:9, 86:14, 90:15, 115:21, 125:25, 126:24</p>	<b>G</b>
<b>F</b>						
<b>G</b>						

<p><b>Gets</b> - 20:1, 41:11, 41:12, 102:19  <b>GIS</b> - 15:8, 18:1, 43:14  <b>Given</b> - 23:11, 25:21, 61:14, 68:1, 105:6, 105:9  <b>Gives</b> - 36:13  <b>GLYLNN</b> - 1:5  <b>Glynn</b> - 1:4, 1:19, 41:21, 61:6, 99:23, 99:24, 125:17, 126:6, 126:17, 126:22  <b>GLYNNE</b> - 65:7  <b>Go</b> - 1:23, 2:16, 2:20, 9:14, 10:6, 24:17, 25:20, 28:17, 33:12, 34:15, 35:7, 35:8, 39:24, 41:24, 42:4, 42:15, 46:1, 46:12, 46:14, 47:22, 48:20, 49:7, 61:12, 81:16, 84:8, 86:16, 94:11, 95:15, 97:3, 100:6, 108:6, 110:9, 114:13  <b>Goal</b> - 31:7  <b>Going</b> - 9:6, 9:13, 10:11, 10:13, 10:25, 11:15, 13:2, 27:15, 27:21, 28:3, 30:13, 34:11, 38:22, 42:11, 44:9, 44:19, 45:23, 48:17, 50:2, 50:15, 52:4, 55:7, 55:17, 55:18, 60:8, 62:20, 65:16, 74:22, 87:19, 94:6, 94:16, 98:24, 98:25, 99:2, 106:14, 116:2, 116:6, 116:7, 126:4, 126:9  <b>Gone</b> - 53:19  <b>Good</b> - 1:3, 2:7, 2:10, 10:17, 10:19, 10:20, 66:2, 74:16, 74:19, 92:25, 115:24, 116:7, 116:15  <b>Got</b> - 19:15, 20:15, 20:23, 25:16, 39:9, 45:23, 59:23, 65:4, 65:13  <b>Government</b> - 17:21, 24:4</p>	<p><b>Government's</b> - 55:3  <b>GRA</b> - 10:14, 67:15, 67:20, 68:13, 104:15, 105:3, 111:3, 111:8, 111:9, 111:11  <b>Grade</b> - 22:25  <b>Graduated</b> - 74:25, 75:3  <b>Graphs</b> - 8:16  <b>Greater</b> - 83:6  <b>Greene</b> - 2:4, 2:6, 2:11, 3:3, 3:10, 3:22, 5:2, 5:8, 5:15, 6:1, 6:17, 7:2, 7:8, 10:5, 11:2, 11:11, 11:16, 11:20, 15:25, 16:8, 16:17, 18:6, 18:23, 19:3, 23:15, 24:14, 25:1, 25:17, 26:2, 28:8, 28:16, 28:20, 29:3, 29:7, 29:13, 29:22, 30:3, 32:6, 32:15, 32:25, 33:10, 33:18, 34:2, 34:24, 35:5, 36:20, 37:15, 39:12, 39:19, 40:13, 41:9, 41:23, 45:18, 45:24, 46:8, 48:6, 49:16, 50:17, 54:1, 54:8, 54:13, 54:18, 55:6, 56:8, 57:19, 58:24, 60:23, 61:8, 62:15, 64:8, 64:20, 123:24, 123:25, 126:15  <b>Grid</b> - 19:8  <b>Growing</b> - 52:3, 54:23, 55:4, 55:13, 56:13, 57:5  <b>Growth</b> - 19:12, 20:5, 20:7, 20:9, 20:21, 21:4, 21:5, 21:7, 21:16, 22:9, 22:17, 23:13, 24:1, 24:18, 24:21, 25:4, 86:17, 101:21, 103:8, 124:11, 124:13, 125:7, 125:11  <b>Guarantee</b> - 50:15  <b>Guess</b> - 31:7, 65:8, 83:2, 87:19, 96:20, 99:13, 102:6, 108:5, 108:13,</p>	<p>109:12, 114:25, 116:23  <b>Guided</b> - 91:16  <b>Guiding</b> - 88:5</p> <div style="border: 1px solid black; text-align: center; width: fit-content; margin: 10px auto;"> <p><b>H</b></p> </div> <p><b>Hackers</b> - 36:5, 37:5, 45:9  <b>Half</b> - 39:25, 40:15, 41:12, 46:15, 59:2  <b>Halifax</b> - 45:17  <b>Happening</b> - 17:23, 19:16, 27:24, 38:25, 44:7, 44:10, 89:3, 107:4, 110:25  <b>Happy</b> - 32:5, 42:14  <b>Hard</b> - 49:21, 55:10, 114:22, 118:10  <b>Hardwoods</b> - 20:17  <b>Hasn't</b> - 123:10  <b>Haven't</b> - 10:2, 21:5, 50:19, 103:25, 123:12  <b>Hazard</b> - 52:17  <b>Headings</b> - 42:16, 42:21  <b>Headline</b> - 45:16  <b>Health</b> - 27:1, 27:7, 27:10  <b>Hear</b> - 42:15  <b>Heard</b> - 2:18, 24:22, 32:8, 32:19  <b>Hearing</b> - 1:21, 1:25, 2:18  <b>Heating</b> - 19:23  <b>Heightened</b> - 35:18  <b>Help</b> - 18:18, 31:16, 38:8, 44:4, 44:8, 62:20  <b>Helped</b> - 13:5  <b>Helpful</b> - 50:22, 92:7, 93:4  <b>He's</b> - 65:16  <b>High</b> - 95:6, 97:13  <b>Higher</b> - 99:3  <b>Highest</b> - 26:17  <b>Highlight</b> - 35:14, 37:3  <b>Highlighted</b> - 53:9, 55:2  <b>Highlights</b> - 20:10  <b>Hire</b> - 37:5, 59:10  <b>Historical</b> - 3:18, 3:24  <b>Historically</b> - 21:7,</p>	<p>88:24, 92:17  <b>Hit</b> - 14:3  <b>Hold</b> - 12:11  <b>Holyrood</b> - 83:3, 89:1, 92:18  <b>Home</b> - 19:23, 21:17, 21:22  <b>Homes</b> - 21:10  <b>Hopefully</b> - 10:20, 89:4  <b>Hoping</b> - 1:22  <b>Hopper</b> - 119:20  <b>Hour</b> - 97:13, 97:15, 101:19, 101:24, 126:5, 126:12  <b>Hours</b> - 3:7, 8:15, 10:11  <b>House</b> - 21:11, 21:13  <b>Huge</b> - 56:2  <b>Human</b> - 59:11  <b>Hundred</b> - 121:21, 121:23  <b>Hurricane</b> - 13:20, 16:15, 56:1  <b>Hydro</b> - 14:17, 59:24, 67:25, 69:14, 85:1, 85:4, 101:8, 101:18, 101:22, 107:10, 126:16, 126:18  <b>Hydro's</b> - 92:20, 100:22</p> <div style="border: 1px solid black; text-align: center; width: fit-content; margin: 10px auto;"> <p><b>I</b></p> </div> <p><b>IBEW</b> - 123:23  <b>Ice</b> - 17:7  <b>I'd</b> - 13:3, 33:11, 34:8, 41:14, 50:1, 50:8, 61:1  <b>Ideal</b> - 91:9  <b>Identified</b> - 20:24, 35:21, 48:4  <b>Identifies</b> - 37:10, 38:24  <b>IFRS</b> - 58:19, 59:22  <b>I'll</b> - 12:8, 24:13, 25:13, 29:15, 44:12, 45:3, 48:16, 48:23, 50:24, 58:21, 121:8  <b>I'm</b> - 11:15, 31:7, 34:3, 46:1, 48:8, 61:22, 62:18, 66:2, 66:10, 66:22, 74:21, 78:15,</p>	<p>86:15, 96:6, 97:10, 106:5, 109:13, 118:15, 119:17, 120:6, 120:8, 125:18, 126:4  <b>Imagine</b> - 126:4  <b>Immediately</b> - 12:24, 12:25, 39:6, 112:8  <b>Immigration</b> - 24:21  <b>Immune</b> - 64:4  <b>Impact</b> - 8:2, 8:7, 13:18, 15:21, 19:8, 19:12, 33:2, 56:2, 57:16, 85:18, 94:2, 94:6, 99:10, 106:5, 109:25  <b>Impactful</b> - 16:16, 17:13  <b>Impacting</b> - 10:23  <b>Impacts</b> - 13:22, 17:15, 55:24, 68:8, 87:16, 94:15  <b>Implement</b> - 38:15, 38:19, 41:1, 68:4, 107:20, 111:11  <b>Implementation</b> - 26:5, 28:15, 40:24, 84:10  <b>Implemented</b> - 14:24, 15:3, 31:4, 35:13, 35:23, 48:22, 49:1, 111:3, 117:10  <b>Implementing</b> - 94:12, 105:15  <b>Implications</b> - 117:16  <b>Importance</b> - 86:23, 88:2  <b>Important</b> - 12:4, 12:20, 29:4, 35:14, 55:15, 56:5, 63:20, 87:13, 92:25, 93:6  <b>Improve</b> - 15:12, 63:2  <b>Improved</b> - 15:1, 62:11  <b>Improvement</b> - 26:25, 27:18  <b>Improvements</b> - 28:6, 31:2  <b>Incenting</b> - 9:5  <b>Incentive</b> - 5:12, 7:9, 7:12, 7:19, 8:5, 8:22, 9:4, 77:3</p>
---	---	--	--	--

<p><b>Incentives</b> - 76:25  <b>Incidents</b> - 27:13, 45:14  <b>Inclining</b> - 89:2, 90:1  <b>Incorporated</b> - 13:11, 17:19, 19:19, 20:1, 44:1  <b>Increase</b> - 32:10, 32:20, 33:5, 33:19, 33:22, 34:7, 34:14, 34:15, 34:19, 42:13, 46:16, 46:18, 46:19, 47:15, 49:19, 50:20, 51:6, 52:8, 52:22, 53:15, 53:21, 54:21, 56:10, 56:16, 58:1, 58:3, 61:15, 67:21, 70:12, 71:18, 80:2, 80:13, 82:21, 83:18, 83:21, 99:9, 105:4, 106:2, 106:11, 106:15, 107:21, 108:14, 110:5  <b>Increased</b> - 5:6, 6:8, 51:3  <b>Increases</b> - 7:4, 32:17, 42:9, 44:17, 47:3, 50:7, 61:23, 81:4  <b>Increasing</b> - 4:12, 19:9, 24:22, 33:4, 44:3, 52:7, 56:11, 57:21  <b>Incremental</b> - 37:19, 38:11, 47:15  <b>Incur</b> - 52:19, 57:9, 59:14  <b>Incurring</b> - 56:24  <b>Indicated</b> - 26:3, 43:8, 43:16, 74:24, 76:13, 78:7, 79:20, 81:20, 82:10, 93:20, 103:21, 103:25, 104:20, 106:8, 113:23, 118:15, 118:19, 120:12, 125:20  <b>Indication</b> - 93:6  <b>Industry</b> - 50:9  <b>Inflation</b> - 6:11, 6:18, 9:9, 9:15, 33:3, 33:6, 44:3, 57:22, 58:4, 61:10,</p>	<p>61:11  <b>Inflationary</b> - 64:1  <b>Inflection</b> - 83:2  <b>Influence</b> - 4:20  <b>Influenced</b> - 4:9, 4:14  <b>Influencing</b> - 5:11  <b>Informed</b> - 117:12  <b>Infrastructure</b> - 13:23, 17:1, 18:4, 21:19, 28:2, 36:5, 38:18, 42:10, 43:2  <b>Ingredients</b> - 108:6, 108:8, 116:19  <b>Initially</b> - 116:9  <b>Initiated</b> - 109:10  <b>Initiative</b> - 105:16, 112:6  <b>Initiatives</b> - 16:1, 18:8, 19:15  <b>Injuries</b> - 27:12, 27:19  <b>Input</b> - 2:2, 67:24, 69:25, 108:9, 109:24  <b>Inputs</b> - 1:20  <b>Inspect</b> - 51:24, 57:5, 57:10  <b>Inspecting</b> - 57:6  <b>Inspection</b> - 51:23, 53:11, 54:15, 56:16  <b>Inspections</b> - 28:1, 31:6, 54:2, 54:3, 54:19, 56:11, 57:1  <b>Inspectors</b> - 52:1  <b>Install</b> - 21:13  <b>Installed</b> - 36:13  <b>Insurance</b> - 9:23  <b>Integrated</b> - 31:15  <b>Integration</b> - 68:3  <b>Intend</b> - 42:14, 122:6  <b>Intention</b> - 100:20  <b>Interconnected</b> - 6:8, 2  <b>Interest</b> - 30:17  <b>Interesting</b> - 75:14  <b>Internally</b> - 18:16, 37:10, 41:6  <b>Internet</b> - 48:20  <b>Intervenors</b> - 31:21  <b>Interview</b> - 76:6, 76:9  <b>Introduce</b> - 65:24  <b>Introduced</b> - 12:24, 35:16, 70:6  <b>Introduction</b> - 38:1</p>	<p>0  <b>Investment</b> - 47:6, 124:22  <b>Involve</b> - 114:11  <b>Involvement</b> - 30:6  <b>Island</b> - 60:10, 68:1  <b>Isn't</b> - 12:25, 41:14, 94:8  <b>ISO</b> - 26:13, 26:21, 27:3  <b>Issue</b> - 1:7, 1:9, 91:20, 99:11, 109:17  <b>Issues</b> - 22:11, 23:25, 83:24  <b>Items</b> - 17:17  <b>It's</b> - 2:4, 7:20, 11:21, 12:4, 12:20, 12:23, 20:18, 20:20, 20:22, 21:3, 21:4, 21:8, 22:19, 23:22, 23:24, 24:9, 24:19, 26:14, 26:15, 26:21, 26:24, 35:9, 35:14, 40:4, 44:13, 46:4, 46:14, 50:2, 50:8, 51:4, 52:17, 53:3, 55:10, 55:15, 56:5, 56:21, 57:17, 58:22, 60:24, 62:9, 63:20, 64:24, 71:20, 74:11, 87:12, 89:23, 90:14, 92:7, 92:10, 93:4, 104:21, 108:18, 118:5, 119:23, 119:24, 124:12  <b>I've</b> - 61:20, 65:4, 100:9</p> <p style="text-align: center;"><b>J</b></p> <p><b>January</b> - 84:11, 97:7, 97:25, 98:17, 98:19, 100:19  <b>Jobs</b> - 53:13  <b>John's</b> - 66:15  <b>Joined</b> - 66:11, 66:15  <b>July</b> - 61:16, 101:9, 101:18, 114:1, 114:4  <b>June</b> - 100:6  <b>Justification</b> - 118:8  <b>Justified</b> - 107:22, 108:15, 108:18</p>	<p style="text-align: center;"><b>K</b></p> <p><b>Keeps</b> - 8:22  <b>Kelligrews</b> - 20:16  <b>Key</b> - 2:24, 7:21, 27:5, 27:22, 35:2, 35:21, 37:20, 38:14, 53:16, 59:19, 63:1  <b>Kilometres</b> - 51:13, 57:7  <b>Kilowatt</b> - 97:12, 97:15, 101:19, 101:24  <b>Kinds</b> - 50:7  <b>Knowing</b> - 1:24  <b>Known</b> - 20:9  <b>KPI</b> - 27:5</p> <p style="text-align: center;"><b>L</b></p> <p><b>Labour</b> - 34:10, 44:21, 50:12, 57:10  <b>Labrador</b> - 14:16, 24:7, 75:15, 76:8  <b>Land</b> - 117:1  <b>Laptops</b> - 15:15  <b>Largely</b> - 9:21  <b>Larger</b> - 13:25, 24:8  <b>Largest</b> - 38:11  <b>Larry</b> - 16:15  <b>Later</b> - 1:16, 62:1, 114:4  <b>Latest</b> - 23:9  <b>Latter</b> - 20:15  <b>Layer</b> - 18:3  <b>Layers</b> - 17:20  <b>Leave</b> - 109:17  <b>Leaves</b> - 39:20  <b>Left</b> - 28:24, 89:25  <b>Legal</b> - 58:16, 59:12, 60:5, 60:20  <b>Length</b> - 26:5  <b>Let's</b> - 27:23, 85:21, 98:25  <b>Level</b> - 7:11, 22:20, 26:17, 50:16, 76:20, 76:21, 119:22  <b>Levels</b> - 86:18  <b>LIAM</b> - 65:19  <b>Licensing</b> - 40:7, 44:17, 45:1, 47:16, 63:17  <b>Light</b> - 80:8, 83:11, 115:16  <b>Likewise</b> - 81:10</p>	<p><b>Line</b> - 12:13, 13:13, 17:19, 21:12, 22:2, 23:12, 28:21, 33:20, 51:4, 52:13, 52:14, 52:18, 52:20, 53:5, 53:7, 54:14, 55:22, 57:15, 57:24, 64:2, 81:21, 84:9, 85:22, 86:16, 87:22, 91:25, 97:4, 100:12  <b>Lines</b> - 13:14, 13:15, 13:19, 15:20, 20:10, 22:15, 51:14, 51:16, 51:20, 51:24, 52:2, 52:3, 52:5, 53:2, 55:17, 56:3, 56:6, 57:11  <b>Link</b> - 36:12  <b>List</b> - 24:12, 61:3  <b>Load</b> - 19:23, 19:25, 20:4, 20:21, 21:7, 23:21, 24:18, 24:21, 25:4, 70:10, 103:8, 108:2, 112:12, 112:21, 113:21, 114:23, 115:23, 117:12, 117:16, 117:21, 123:1, 123:5, 124:11, 124:13, 124:21, 124:24, 125:4, 125:7, 125:10, 125:11  <b>Loading</b> - 12:16, 17:7  <b>Local</b> - 75:11  <b>Located</b> - 120:23  <b>Location</b> - 15:10  <b>Lond</b> - 124:9  <b>London</b> - 32:20, 61:13, 100:7, 102:8  <b>Long</b> - 43:4, 63:18, 109:19, 110:15, 120:11, 120:24, 122:16, 122:25, 126:9, 126:20  <b>Longer</b> - 24:12, 41:8, 43:9, 43:13, 43:17, 55:5, 55:13  <b>Look</b> - 6:3, 7:17, 9:11, 10:7, 10:10, 13:2, 18:3, 20:14, 24:5, 27:14, 27:24, 33:11, 33:19, 39:22, 42:6, 42:13, 44:11,</p>
--	--	--	--	---



<p>46:9, 49:21, 53:10, 55:24, 57:23, 60:16, 63:13, 85:10, 85:21, 90:8, 92:13, 92:21, 94:11, 94:25, 95:2, 104:9, 104:11, 106:23, 108:4, 110:1, 110:5, 116:3, 116:8, 116:23</p> <p><b>Looked</b> - 3:4, 17:2, 34:5, 46:21, 48:7, 49:2, 56:14, 106:24, 107:3, 124:21</p> <p><b>Looking</b> - 11:13, 22:12, 22:13, 32:9, 35:22, 36:3, 49:14, 60:17, 60:18, 61:15, 61:22, 62:18, 63:17, 86:10, 91:15, 94:25, 97:3, 104:6, 109:24, 118:6, 119:14</p> <p><b>Lose</b> - 48:18</p> <p><b>Lost</b> - 100:9</p> <p><b>Lot</b> - 8:20, 14:7, 14:8, 14:24, 15:18, 18:15, 30:24, 31:15, 44:21, 62:10, 63:2, 75:13, 82:25, 83:7, 97:11, 103:5, 108:6, 125:2</p> <p><b>Low</b> - 95:5</p> <p><b>Lower</b> - 4:2, 4:3, 5:4, 7:13, 17:11, 49:12, 68:17, 68:23, 86:18, 86:19, 102:2</p> <div style="border: 1px solid black; text-align: center; width: 100px; margin: 10px auto;">M</div> <p><b>Main</b> - 22:2, 42:3, 51:21, 53:8, 58:8</p> <p><b>Maintain</b> - 51:15</p> <p><b>Maintaining</b> - 71:9, 97:6, 97:24, 98:2, 98:8</p> <p><b>Maintenance</b> - 7:2 3, 8:23, 13:9, 29:18, 30:15, 31:6</p> <p><b>Major</b> - 4:16, 4:17, 13:18, 14:13, 14:15, 15:2, 15:8, 24:10, 31:17</p> <p><b>Make</b> - 28:6, 60:22, 67:7, 72:9, 80:12,</p>	<p>83:15, 85:15, 90:6, 120:3, 121:8, 125:25</p> <p><b>Making</b> - 27:6, 69:19, 73:9, 85:17, 90:5, 98:5</p> <p><b>Malicious</b> - 36:11, 38:25</p> <p><b>Manage</b> - 42:25, 43:2, 64:6</p> <p><b>Managed</b> - 40:22</p> <p><b>Management</b> - 8:5, 10:3, 14:17, 15:3, 15:13, 25:19, 25:22, 26:13, 26:15, 26:16, 26:18, 27:2, 27:9, 27:21, 31:4, 31:10, 35:16, 38:13, 43:11, 43:18, 47:12, 48:2, 48:11, 50:21, 51:9, 51:11, 56:19, 56:20</p> <p><b>Manager</b> - 78:8, 78:15</p> <p><b>Many</b> - 4:18, 22:22, 39:4, 87:7, 92:11, 104:11</p> <p><b>Mapped</b> - 15:9</p> <p><b>March</b> - 113:25</p> <p><b>Marginal</b> - 68:17, 69:3, 69:17, 83:9, 84:4, 84:12, 84:20, 86:19, 87:23, 88:8, 88:12, 88:15, 89:8, 90:14, 91:2, 91:4, 92:9, 92:18, 92:23, 93:15, 93:17, 93:21, 93:23, 94:12, 94:19, 95:5, 95:22, 95:24, 96:8, 96:9, 97:17, 98:6, 98:9, 100:13, 100:14, 100:22, 101:8, 102:2, 102:9, 102:13, 102:15, 103:4, 103:9, 103:14, 103:16, 103:23, 104:12, 104:13, 104:21, 109:21, 110:1, 110:4, 110:7, 115:17, 116:12</p> <p><b>Maritime</b> - 16:19, 16:24, 18:24</p> <p><b>Market</b> - 9:23, 44:2, 44:19, 50:12</p> <p><b>Master's</b> - 66:10,</p>	<p>75:6</p> <p><b>Matching</b> - 96:22</p> <p><b>Materialized</b> - 123:10</p> <p><b>Materializing</b> - 107:5</p> <p><b>Math</b> - 33:24, 34:3, 34:13</p> <p><b>Matters</b> - 1:4, 67:4, 99:23</p> <p><b>Maxed</b> - 23:1</p> <p><b>Maximum</b> - 43:5</p> <p><b>Means</b> - 43:23, 57:6, 63:6, 88:8, 101:21, 105:25</p> <p><b>Measure</b> - 2:13, 5:9, 41:5</p> <p><b>Measures</b> - 2:19, 2:20</p> <p><b>Meet</b> - 4:25, 7:5, 118:12</p> <p><b>Memorial</b> - 74:25, 75:4, 120:23, 120:25, 121:1, 122:7</p> <p><b>Mentioning</b> - 34:19, 55:19, 55:23</p> <p><b>Met</b> - 10:2</p> <p><b>Meter</b> - 21:13, 117:11</p> <p><b>Meters</b> - 117:15, 118:2, 118:7, 118:12</p> <p><b>Methodologies</b> - 7 3:5, 73:22</p> <p><b>Methodology</b> - 5:2 3, 26:16, 67:19, 72:3, 72:23, 73:1, 73:11</p> <p><b>Metrics</b> - 2:24, 5:10, 6:4, 6:6</p> <p><b>Michael</b> - 65:16, 65:18, 66:2, 74:13</p> <p><b>Migrate</b> - 49:11</p> <p><b>Migration</b> - 49:8</p> <p><b>Million</b> - 20:23, 33:21, 34:6, 39:25, 40:16, 41:11, 41:12, 51:4, 51:5, 58:1, 58:2, 58:9, 59:2, 61:1, 61:4, 120:12, 122:7</p> <p><b>Minds</b> - 62:9</p> <p><b>Minimize</b> - 8:2, 8:7, 8:24, 15:21</p> <p><b>Minimized</b> - 63:19</p> <p><b>Minimizing</b> - 13:18,</p>	<p>49:9</p> <p><b>Mistaken</b> - 28:19, 29:2</p> <p><b>Mitigation</b> - 61:21, 116:2</p> <p><b>Modern</b> - 44:12, 44:15</p> <p><b>Modify</b> - 68:16</p> <p><b>Money</b> - 119:7</p> <p><b>Monitor</b> - 40:11</p> <p><b>Monitoring</b> - 37:12, 39:4, 59:16</p> <p><b>Monitors</b> - 38:20, 39:2</p> <p><b>Month</b> - 93:9</p> <p><b>Months</b> - 28:6, 113:11</p> <p><b>Morning</b> - 1:3, 2:7, 2:10, 66:2, 74:16, 74:19, 103:22, 103:25</p> <p><b>Mouth</b> - 106:10</p> <p><b>Move</b> - 19:4, 31:11, 37:9, 108:11, 123:23</p> <p><b>Moving</b> - 32:7, 68:21, 100:5</p> <p><b>Much</b> - 24:8, 63:19, 72:12, 78:4, 94:10, 99:8, 124:16</p> <p><b>Multiply</b> - 23:10</p> <p><b>MUM</b> - 122:21</p> <p><b>MUN</b> - 120:14, 121:12, 125:5</p> <p><b>Municipalities</b> - 14 :18</p> <p><b>Murray</b> - 3:17, 19:19, 61:13</p> <p><b>Muskrat</b> - 68:3, 80:10, 83:5, 88:15, 116:23</p> <div style="border: 1px solid black; text-align: center; width: 100px; margin: 10px auto;">N</div> <p><b>Natural</b> - 10:24</p> <p><b>Near</b> - 18:4, 52:2, 52:13, 52:20</p> <p><b>Nearest</b> - 15:11</p> <p><b>Necessary</b> - 14:21, 62:3, 119:23</p> <p><b>Needed</b> - 31:11</p> <p><b>Negotiate</b> - 63:16</p> <p><b>Neighbourhood</b> - 21:17</p> <p><b>Network</b> - 36:8, 42:10</p> <p><b>Networks</b> - 36:16,</p>	<p>38:21, 38:23, 45:13</p> <p><b>New</b> - 15:2, 21:8, 21:9, 22:16, 27:15, 37:1, 40:20, 42:18, 42:23, 60:9, 65:13, 68:4, 79:22, 84:10, 86:6, 88:14, 92:2, 92:4, 92:15, 108:3, 120:14, 122:23, 123:1</p> <p><b>Newfoundland</b> - 2: 21, 7:10, 9:22, 11:6, 12:15, 12:17, 14:16, 15:6, 16:4, 16:12, 16:21, 17:7, 18:10, 19:11, 19:17, 21:4, 21:7, 21:14, 24:7, 25:5, 25:21, 27:8, 29:24, 30:5, 30:23, 32:8, 33:2, 35:17, 36:1, 38:21, 39:8, 41:6, 45:4, 46:22, 47:19, 48:15, 51:12, 52:12, 52:14, 53:22, 55:5, 60:10, 61:18, 61:24, 62:6, 63:11, 63:22, 64:10, 64:18, 66:3, 66:7, 66:12, 66:23, 67:3, 67:13, 67:17, 67:22, 68:15, 68:24, 69:5, 69:10, 69:14, 71:2, 71:8, 71:24, 72:6, 72:18, 72:24, 73:25, 75:17, 75:18, 76:2, 76:5, 76:7, 79:7, 79:12, 80:2, 81:17, 81:20, 81:22, 84:23, 84:25, 85:2, 85:10, 86:11, 87:6, 87:13, 87:21, 88:22, 90:3, 92:1, 96:18, 97:5, 100:23, 101:2, 101:6, 105:3, 106:1, 106:19, 109:2, 111:12, 112:10, 112:24, 115:15, 117:10, 118:1, 118:10, 118:20, 118:24, 119:21, 120:2, 122:6</p> <p><b>NEWMAN</b> - 124:3</p> <p><b>Night</b> - 55:21</p>
--	--	--	--	--

<p><b>Nine</b> - 94:5  <b>Normal</b> - 4:19, 8:1, 21:13, 24:2  <b>Normally</b> - 64:14  <b>Note</b> - 12:20  <b>Nova</b> - 56:1  <b>November</b> - 77:13  <b>NP</b> - 2:17, 10:8, 10:9, 11:12, 12:6, 24:16, 25:2, 25:20, 30:4, 33:13, 35:7, 41:24, 42:4, 53:10, 81:16, 84:8, 95:15, 97:4</p> <div style="border: 1px solid black; text-align: center; width: 100px; margin: 10px auto;">O</div> <p><b>O'brien</b> - 65:1, 65:5, 65:14, 65:19, 65:21, 65:22, 66:5, 66:18, 67:6, 67:12, 68:9, 69:4, 70:17, 71:19, 73:7, 73:18, 74:3, 74:8, 124:5, 125:14, 126:3, 126:8, 126:13  <b>Occur</b> - 9:3, 18:2, 41:2, 101:18  <b>Occurring</b> - 20:7, 22:9, 45:2  <b>Often</b> - 53:2  <b>Oil</b> - 23:16  <b>Old</b> - 44:14, 47:17  <b>Older</b> - 44:18  <b>One</b> - 1:20, 2:23, 5:9, 6:4, 8:10, 10:16, 10:17, 11:3, 11:4, 11:21, 12:15, 18:9, 19:6, 20:16, 21:2, 22:5, 32:19, 33:1, 34:10, 40:9, 40:19, 42:15, 45:7, 45:20, 46:9, 47:1, 47:11, 48:4, 54:14, 58:6, 58:22, 73:17, 78:8, 80:20, 84:25, 85:12, 85:18, 91:19, 92:9, 92:13, 93:2, 94:24, 95:11, 98:10, 99:14, 100:11, 100:12, 109:4, 110:19, 115:1, 115:3, 116:1, 120:3, 124:8, 124:25  <b>Ones</b> - 58:8  <b>Ongoing</b> - 25:22, 26:4, 28:11, 42:18,</p>	<p>47:16, 54:9, 54:19, 70:2, 94:24  <b>Open</b> - 30:21  <b>Opening</b> - 8:13, 9:11  <b>Operate</b> - 43:22  <b>Operating</b> - 4:20, 6:3, 6:12, 6:20, 7:11, 9:6, 9:7, 9:13, 16:4, 19:5, 32:7, 32:11, 32:20, 33:6, 36:16, 57:20, 62:6, 62:24  <b>Operation</b> - 21:14, 39:3  <b>Operational</b> - 15:1, 29:17, 63:9  <b>Operations</b> - 7:22, 8:1, 11:5, 11:7, 17:6, 17:8, 25:7, 29:25, 30:8, 30:15, 30:25, 31:16, 31:18, 43:21, 46:14, 48:21, 55:16, 58:15, 62:12  <b>Opinion</b> - 49:18  <b>Opposed</b> - 29:9, 32:3  <b>Options</b> - 46:24  <b>Order</b> - 112:23, 115:10  <b>Orders</b> - 15:16, 52:9, 53:11  <b>Organization</b> - 26:20  <b>Organizational</b> - 14:11  <b>Organizations</b> - 17:3, 35:22, 45:15, 58:13  <b>Original</b> - 9:11, 36:24, 95:16, 120:15  <b>Ourselves</b> - 26:13  <b>Outage</b> - 3:7, 8:16, 10:11, 15:3, 15:12, 15:21, 43:18, 63:4  <b>Outages</b> - 7:25, 8:24, 9:2, 14:4, 15:8, 27:25, 31:17, 51:18  <b>Outcome</b> - 60:11, 111:24  <b>Outcomes</b> - 11:1  <b>Outlier</b> - 3:15  <b>Outlined</b> - 16:1, 40:2, 86:8</p>	<p><b>Outlines</b> - 18:20  <b>Outlook</b> - 25:16  <b>Output</b> - 5:23  <b>Outsourcing</b> - 48:10  <b>Overtime</b> - 55:22  <b>Own</b> - 39:3, 86:11, 108:10</p> <div style="border: 1px solid black; text-align: center; width: 100px; margin: 10px auto;">P</div> <p><b>Paid</b> - 36:22, 120:25, 121:9, 121:15, 122:3, 122:15, 122:21  <b>Parameters</b> - 12:12  <b>Participating</b> - 79:24  <b>Participation</b> - 2:1  <b>Particularly</b> - 73:15  <b>Parties</b> - 32:4, 79:23, 110:24, 112:15, 113:25, 114:2, 115:2, 115:19, 117:7, 126:2  <b>Parts</b> - 80:20  <b>Party</b> - 39:1, 45:11  <b>Pass</b> - 51:14, 74:9  <b>Passed</b> - 103:7  <b>Past</b> - 15:17, 43:9, 43:13, 43:17, 62:19, 71:7, 77:17, 78:20, 78:22, 88:16, 89:10, 93:9  <b>Patching</b> - 46:7  <b>Path</b> - 111:12, 111:14  <b>Pay</b> - 39:11, 40:14, 58:10, 58:13, 72:13, 72:18, 100:13, 103:15  <b>Payers</b> - 47:2, 58:9  <b>Paying</b> - 40:7, 102:23, 121:12  <b>Payments</b> - 5:12, 7:12  <b>Peak</b> - 70:11  <b>PEI</b> - 17:14, 56:1  <b>Penetration</b> - 37:2  <b>Percent</b> - 9:18, 9:20, 13:4, 32:9, 32:10, 32:11, 32:21, 33:23, 34:7, 34:13, 42:12, 46:10, 46:13, 46:15, 46:18, 46:19, 51:6, 53:15, 53:21, 58:3,</p>	<p>61:16, 61:17, 61:18, 71:10, 77:4, 77:6, 78:1, 78:5, 80:4, 80:12, 81:4, 82:20, 83:21, 105:5, 105:17, 105:21, 106:2, 106:11, 106:14, 107:2, 107:21, 108:14, 108:22, 118:21, 119:5, 119:8, 119:24, 121:21, 121:23  <b>Percentage</b> - 121:19  <b>Performance</b> - 2:14, 2:19, 3:25, 5:10, 6:5, 7:20, 9:5  <b>Perhaps</b> - 35:6, 99:7, 100:10  <b>Period</b> - 6:22, 26:5, 32:21, 58:23, 62:2, 114:24  <b>Periodically</b> - 109:4  <b>Personally</b> - 119:17  <b>Personnel</b> - 52:21  <b>Perspectives</b> - 36:2  <b>Phase</b> - 28:10, 28:22, 115:1, 115:13, 115:20, 116:1  <b>Phases</b> - 115:8, 115:12  <b>Philosophy</b> - 49:6  <b>Pick</b> - 39:6  <b>Picking</b> - 57:14  <b>Piece</b> - 13:24, 14:23, 38:11, 38:14, 40:20, 43:2, 45:11, 47:8, 57:17, 84:17  <b>Pinpoint</b> - 55:11  <b>Place</b> - 14:13, 14:14, 14:19, 15:18, 17:17, 18:15, 26:23, 27:22, 36:9, 37:13, 37:22, 37:24, 37:25, 38:18, 40:23, 43:3, 79:7, 85:6  <b>Plan</b> - 1:12, 1:17, 2:20, 3:5, 7:23, 8:2, 18:8, 20:16, 23:13, 24:3, 24:4, 24:11,</p>	<p>24:18, 25:3, 25:13, 25:14, 27:16, 37:25, 44:1, 51:8, 55:4, 76:18, 76:23, 92:3, 117:4  <b>Planned</b> - 7:24, 7:25, 8:24, 55:20, 117:5  <b>Planning</b> - 19:11, 19:20, 20:2, 24:2, 25:3, 28:15, 30:16  <b>Plans</b> - 14:14, 23:18, 38:5  <b>Plants</b> - 55:7  <b>Playing</b> - 83:4, 83:6  <b>Pleased</b> - 76:9  <b>Pockets</b> - 22:16  <b>Policies</b> - 73:5, 73:22  <b>Policy</b> - 72:2, 72:12, 72:14, 73:12, 124:20, 124:23  <b>Pond</b> - 120:11, 120:24, 122:17, 122:25, 124:10  <b>Poor</b> - 8:20  <b>Port</b> - 13:21  <b>Posed</b> - 61:12  <b>Position</b> - 75:20, 76:3, 76:5, 79:9, 115:25  <b>Positioned</b> - 89:8, 89:9  <b>Positions</b> - 73:15, 74:1  <b>Post</b> - 50:12  <b>Potential</b> - 13:22, 30:14, 69:20  <b>Potentially</b> - 23:23  <b>Power</b> - 2:21, 7:10, 11:6, 14:5, 15:6, 15:22, 16:5, 16:12, 16:21, 18:10, 19:11, 19:17, 20:3, 20:11, 20:17, 21:4, 21:8, 21:14, 21:25, 25:5, 25:22, 27:8, 30:5, 30:23, 32:8, 33:2, 35:17, 36:1, 39:8, 41:6, 45:4, 46:22, 47:19, 48:15, 51:12, 51:19, 52:2, 52:12, 52:13, 52:14, 53:2, 53:7, 53:22, 60:10,</p>
---	--	--	---	---

<p>61:19, 61:20, 61:24, 62:6, 63:11, 63:22, 64:10, 64:18, 66:4, 66:8, 66:12, 67:13, 67:17, 67:23, 68:16, 69:6, 69:14, 71:2, 71:8, 71:24, 72:19, 72:24, 73:25, 75:17, 75:18, 76:2, 76:6, 76:7, 79:7, 79:12, 80:2, 81:18, 81:20, 81:22, 84:24, 84:25, 85:2, 87:8, 87:14, 87:21, 90:4, 92:1, 97:19, 100:24, 101:3, 106:1, 106:19, 109:2, 111:12, 112:10, 117:10, 118:1, 118:11, 118:24, 119:21, 120:2, 122:6, 124:15</p> <p><b>Powers'</b> - 101:6</p> <p><b>Power's</b> - 9:22, 29:24, 38:21, 66:23, 67:3, 68:24, 69:10, 72:6, 85:10, 86:11, 87:7, 88:22, 96:19, 97:5, 105:4, 112:24, 115:15, 118:20</p> <p><b>Practical</b> - 84:15, 84:21, 86:21, 87:25</p> <p><b>Practice</b> - 54:9, 54:20</p> <p><b>Practices</b> - 16:4, 26:15, 29:18, 30:16, 56:14</p> <p><b>Pragmatic</b> - 107:13, 107:17, 108:14, 108:24, 119:22, 120:1</p> <p><b>Pre</b> - 67:8, 95:16</p> <p><b>Predict</b> - 49:21</p> <p><b>Predicted</b> - 15:4</p> <p><b>Preferrable</b> - 93:13</p> <p><b>Preliminary</b> - 1:3, 99:23</p> <p><b>Premise</b> - 49:3, 49:4, 52:16</p> <p><b>Preparation</b> - 80:7</p> <p><b>Prepared</b> - 18:10, 46:21</p> <p><b>Preparing</b> - 11:24,</p>	<p>14:9, 25:12, 60:20</p> <p><b>Present</b> - 18:14</p> <p><b>Pressure</b> - 50:9, 101:25, 102:3</p> <p><b>Pressures</b> - 64:1, 64:5</p> <p><b>Prevent</b> - 51:18</p> <p><b>Preventative</b> - 13:8, 31:5</p> <p><b>Previous</b> - 4:3, 5:22, 7:13, 111:15</p> <p><b>Previously</b> - 71:16</p> <p><b>Price</b> - 85:9, 86:24, 88:6, 89:9, 89:20, 90:10, 90:18, 90:22, 91:10, 91:18, 91:20, 93:12, 102:24</p> <p><b>Principle</b> - 84:15, 86:21, 87:1, 88:5, 89:18, 89:21, 90:13, 90:20, 91:8</p> <p><b>Principles</b> - 86:15, 87:11, 87:20, 87:25, 91:17, 91:18, 93:12</p> <p><b>Prior</b> - 66:7, 79:8, 82:19, 105:15, 110:18</p> <p><b>Procedures</b> - 29:1, 8</p> <p><b>Proceedings</b> - 58:1, 8, 60:14</p> <p><b>Processes</b> - 24:2, 31:5, 32:1</p> <p><b>Professional</b> - 66:1, 0, 86:5</p> <p><b>Professionals</b> - 44:22</p> <p><b>Program</b> - 13:7, 19:18, 27:1, 35:17, 35:24, 37:21, 117:11</p> <p><b>Programmers</b> - 44:22</p> <p><b>Programming</b> - 41:1</p> <p><b>Programs</b> - 13:10</p> <p><b>Progress</b> - 114:1</p> <p><b>Progressing</b> - 30:2, 3</p> <p><b>Project</b> - 49:5, 59:9, 68:3, 123:12, 124:21</p> <p><b>Projects</b> - 13:10, 20:15</p> <p><b>Proper</b> - 106:20</p> <p><b>Property</b> - 53:24</p>	<p><b>Proposals</b> - 114:13</p> <p><b>Proposed</b> - 67:17, 80:4, 82:13, 101:12, 111:1</p> <p><b>Proposing</b> - 67:14, 67:20, 68:13, 71:17, 80:2, 81:22</p> <p><b>Provide</b> - 63:4, 89:8</p> <p><b>Provided</b> - 26:10, 33:1, 49:10, 61:3, 72:21, 114:4, 114:25, 115:1, 115:14, 115:18</p> <p><b>Provider</b> - 50:4</p> <p><b>Providers</b> - 44:24</p> <p><b>Provides</b> - 8:4, 31:21, 42:5, 115:14, 120:21, 121:1, 121:5</p> <p><b>Province</b> - 14:18, 45:17</p> <p><b>Provinces</b> - 12:17</p> <p><b>Provincial</b> - 17:21, 24:4, 55:3, 68:19</p> <p><b>PUB</b> - 2:17, 10:9, 11:12, 12:6, 24:16, 25:2, 25:20, 30:4, 33:12, 35:7, 41:24, 42:4, 50:22, 53:10, 84:8, 95:15, 97:3</p> <p><b>Public</b> - 1:25</p> <p><b>Purchase</b> - 97:18, 101:21</p> <p><b>Purchased</b> - 21:22</p> <p><b>Putting</b> - 17:17</p> <p><b>PWC</b> - 35:25, 36:17, 36:22</p> <div style="border: 1px solid black; text-align: center; width: fit-content; margin: 10px auto;">Q</div> <p><b>Qualified</b> - 52:21</p> <p><b>Qualitative</b> - 115:1, 5</p> <p><b>Quantitative</b> - 115:11</p> <p><b>Questioning</b> - 2:5</p> <p><b>Quick</b> - 9:1, 15:12, 65:8</p> <p><b>Quickly</b> - 14:6</p> <div style="border: 1px solid black; text-align: center; width: fit-content; margin: 10px auto;">R</div> <p><b>Radial</b> - 73:16</p> <p><b>Raise</b> - 1:7, 105:16</p> <p><b>Range</b> - 10:24, 71:10, 71:14</p> <p><b>Rates</b> - 66:3,</p>	<p>66:17, 68:25, 71:1, 71:3, 71:22, 71:25, 72:5, 72:7, 72:10, 72:17, 73:10, 76:12, 80:10, 80:11, 82:14, 84:20, 85:10, 86:12, 86:24, 86:25, 87:3, 87:6, 87:23, 88:3, 88:7, 89:5, 89:7, 89:20, 91:15, 92:5, 93:2, 93:22, 94:10, 94:21, 96:9, 96:23, 97:25, 98:3, 98:9, 98:11, 98:13, 98:18, 98:21, 98:24, 99:11, 99:12, 100:8, 103:10, 103:13, 104:10, 104:14, 104:17, 104:19, 104:20, 105:1, 105:7, 105:16, 106:2, 106:15, 106:25, 107:8, 108:14, 109:20, 109:24, 110:10, 111:11, 115:11, 115:16</p> <p><b>Rather</b> - 15:15</p> <p><b>Ratio</b> - 71:6</p> <p><b>Ratios</b> - 71:9, 71:14, 106:25, 107:2</p> <p><b>Re</b> - 65:6</p> <p><b>Reach</b> - 20:12, 21:1</p> <p><b>Reaching</b> - 20:10</p> <p><b>Reason</b> - 24:20, 36:21, 48:19, 113:16</p> <p><b>Reasonable</b> - 73:2, 4, 84:13</p> <p><b>Reasonableness</b> - 71:1</p> <p><b>Rebuilt</b> - 13:4</p> <p><b>Rebuttal</b> - 66:25, 74:1</p> <p><b>Receive</b> - 77:23, 87:8, 91:10, 114:3</p> <p><b>Recent</b> - 4:8, 7:17, 45:20, 62:11, 63:8, 64:1, 77:16, 97:21</p> <p><b>Recently</b> - 18:25, 24:22</p> <p><b>Recognition</b> - 86:2, 3, 88:2</p> <p><b>Recognize</b> - 116:1</p>	<p>5</p> <p><b>Recognized</b> - 12:1, 8, 115:6</p> <p><b>Recognizes</b> - 72:1, 5</p> <p><b>Recognizing</b> - 83:1, 3, 107:9</p> <p><b>Recommendation</b> - 68:18, 70:9, 105:10, 106:9</p> <p><b>Recommendations</b> - 69:7, 73:8, 73:14</p> <p><b>Recommending</b> - 68:11, 68:15, 69:9</p> <p><b>Recommends</b> - 68:21, 69:1</p> <p><b>Recover</b> - 70:24</p> <p><b>Recovered</b> - 72:10, 72:16</p> <p><b>Recovery</b> - 92:22</p> <p><b>Recruited</b> - 76:1</p> <p><b>Redesign</b> - 70:9, 109:20</p> <p><b>Redesigning</b> - 109:23, 110:10</p> <p><b>Reduce</b> - 63:11, 63:23, 64:13</p> <p><b>Reducing</b> - 64:19, 69:2</p> <p><b>Redundancy</b> - 121:1</p> <p><b>Redundant</b> - 120:1, 5, 120:20, 120:21, 121:4, 121:5, 121:12, 121:16, 122:17, 125:3</p> <p><b>Referred</b> - 57:21, 117:25</p> <p><b>Reflect</b> - 7:12, 59:4, 68:16, 90:14, 91:2, 91:4, 93:14, 93:16, 93:25, 95:8, 98:5, 100:21, 103:23, 104:4, 104:13, 104:21, 109:20, 110:2</p> <p><b>Reflected</b> - 24:16, 84:12, 86:24, 88:3, 88:7, 89:1, 89:20, 94:20, 95:22, 95:23, 96:7, 96:9</p> <p><b>Reflecting</b> - 23:18, 93:20, 94:12, 102:13</p> <p><b>Reflection</b> - 9:8, 82:7, 102:17</p>
---	---	---	--	---

<p><b>Reflective</b> - 69:3, 92:9, 100:14, 102:16, 103:15  <b>Reflects</b> - 8:9, 101:8, 102:1  <b>Refund</b> - 72:21, 122:6, 122:11  <b>Regards</b> - 80:10, 84:22, 91:14, 95:4, 100:20, 114:6, 120:7  <b>Region</b> - 66:15  <b>Regional</b> - 66:14  <b>Regular</b> - 27:4, 53:2, 54:20  <b>Regulated</b> - 6:3  <b>Regulation</b> - 59:23  <b>Regulations</b> - 72:1, 72:6, 72:7, 73:11  <b>Regulatory</b> - 58:16, 60:13, 66:16, 78:8, 78:15, 84:15, 85:5, 86:8, 86:21, 87:25  <b>Relate</b> - 73:16  <b>Relation</b> - 73:9, 100:17, 112:23  <b>Relationships</b> - 14:16  <b>Relatively</b> - 77:16, 85:24, 85:25, 86:3  <b>Reliability</b> - 2:13, 2:16, 2:23, 7:11, 7:16, 9:5, 10:10, 10:14, 10:25, 11:23, 12:8, 17:9, 31:2, 60:6, 118:20, 119:5  <b>Remote</b> - 15:19, 76:8  <b>Renewable</b> - 75:14  <b>Replace</b> - 43:23, 47:8  <b>Replaced</b> - 42:22  <b>Replacement</b> - 42:18, 42:19, 42:25  <b>Replacing</b> - 44:11  <b>Report</b> - 58:5, 60:7, 113:3, 113:5, 115:1, 115:13, 116:1  <b>Request</b> - 50:23, 54:22, 73:2, 114:13  <b>Requesting</b> - 53:23  <b>Requests</b> - 52:11, 52:23, 53:19  <b>Require</b> - 69:25, 117:12  <b>Required</b> - 42:21,</p>	<p>42:23, 52:10, 72:13, 73:19, 120:4, 123:1  <b>Requirement</b> - 42:17, 72:8  <b>Research</b> - 108:3, 112:13, 112:21, 113:22, 114:23, 115:23, 117:12, 117:17, 117:21  <b>Resetting</b> - 50:10  <b>Resiliency</b> - 13:24  <b>Resource</b> - 60:6  <b>Resources</b> - 14:21, 14:22, 47:24, 59:12  <b>Respect</b> - 100:8, 105:3, 105:6  <b>Respond</b> - 11:24, 16:2, 18:5, 18:11, 31:16, 50:10, 51:17, 53:6  <b>Responding</b> - 50:10  <b>Response</b> - 7:23, 9:2, 14:5, 15:1, 15:13, 16:11, 28:9, 28:13, 28:23, 34:16, 35:18, 37:19, 37:23, 37:25, 38:5, 56:9, 58:6, 63:5, 114:5  <b>Responsibilities</b> - 14:12  <b>Responsibility</b> - 11:8:5, 118:17  <b>Responsible</b> - 30:8  <b>Restore</b> - 53:6  <b>Restoring</b> - 15:22  <b>Result</b> - 8:10, 9:20, 10:2, 27:20, 71:16, 72:17, 87:17, 107:18  <b>Resulting</b> - 51:19, 86:19  <b>RESUME</b> - 65:11, 99:21  <b>Retail</b> - 79:4, 80:3, 85:16, 87:2, 87:5, 92:5, 93:16, 94:21, 94:23, 95:10, 95:23, 96:9, 96:23, 97:25, 98:18, 98:21, 98:24, 99:12, 101:13, 101:16, 102:12, 102:22, 103:10, 103:13, 103:20,</p>	<p>103:21, 104:10, 105:5, 105:6, 106:15, 109:20, 117:4  <b>Retaining</b> - 114:19, 120:14  <b>Retired</b> - 42:22  <b>Reveals</b> - 71:14  <b>Revenue</b> - 71:3, 71:5, 71:9, 71:14, 106:24, 107:1, 124:15  <b>Reviewed</b> - 68:6, 72:4, 73:1  <b>Reviewing</b> - 27:4, 46:23  <b>Reviews</b> - 72:19, 109:3, 109:7, 109:8  <b>Revised</b> - 89:4, 100:8  <b>RFI</b> - 25:24, 30:4, 85:21, 91:25, 97:3  <b>RFI's</b> - 58:4  <b>Risk</b> - 13:12, 16:25, 17:4, 17:8, 17:16, 35:16, 45:19  <b>Risks</b> - 27:5, 35:18, 48:18  <b>Road</b> - 24:7  <b>Roadmap</b> - 38:15  <b>Rock</b> - 17:12  <b>Role</b> - 83:5, 83:6  <b>Roles</b> - 66:7  <b>Rolling</b> - 25:14  <b>Rough</b> - 121:19  <b>Routine</b> - 21:14, 27:23, 51:24, 52:6  <b>Routinely</b> - 27:6, 47:5  <b>Rules</b> - 72:1, 72:5, 73:10  <b>Rulings</b> - 71:7  <b>Run</b> - 14:9, 21:12</p> <div style="border: 1px solid black; text-align: center; width: fit-content; margin: 10px auto;"> <p><b>S</b></p> </div> <p><b>Safe</b> - 52:17  <b>Safety</b> - 27:1, 27:7, 27:10  <b>SAIDI</b> - 10:7  <b>Salary</b> - 76:25, 77:2, 77:6  <b>Sales</b> - 86:17, 96:19, 97:14  <b>Saves</b> - 119:7  <b>Saving</b> - 119:9  <b>Saw</b> - 13:19, 13:22, 17:14, 45:16,</p>	<p>46:19, 47:14  <b>Scale</b> - 24:8  <b>Schedule</b> - 50:23, 71:25, 72:5, 73:10  <b>Schedules</b> - 73:4  <b>Scope</b> - 114:2, 115:6  <b>Scotia</b> - 56:1  <b>Screen</b> - 57:24  <b>Scroll</b> - 100:10  <b>Searching</b> - 15:23  <b>Season</b> - 55:4, 55:14  <b>Seasonable</b> - 116:10  <b>Seasonal</b> - 92:16, 92:22, 104:10, 110:6  <b>Second</b> - 47:1, 49:17, 52:11, 53:18, 68:22, 69:2, 81:1, 86:14, 90:16, 99:6, 99:8  <b>Secure</b> - 37:4  <b>Security</b> - 34:18, 34:22, 35:4, 35:15, 35:16, 35:18, 37:20, 38:12, 39:21, 45:3, 45:4, 45:14, 45:20, 46:10, 59:22  <b>See</b> - 2:22, 3:6, 3:11, 3:14, 6:6, 6:18, 6:19, 7:3, 8:9, 10:9, 10:22, 10:25, 11:25, 18:10, 21:1, 26:4, 26:11, 27:20, 27:21, 28:9, 32:2, 34:11, 35:8, 37:8, 38:10, 39:24, 41:3, 41:6, 41:7, 41:17, 41:25, 42:7, 42:8, 46:10, 46:23, 47:2, 50:7, 51:3, 54:21, 56:15, 57:24, 58:20, 60:7, 61:24, 89:5, 90:24, 94:2, 94:9, 99:9, 101:1, 127:3  <b>Seeing</b> - 4:12, 4:22, 9:8, 9:19, 21:15, 22:16, 27:11, 35:3, 43:7, 44:2, 44:9, 44:16, 52:22, 59:19, 92:19  <b>Seen</b> - 27:18, 45:13, 52:7, 53:9,</p>	<p>64:3, 97:21  <b>Sending</b> - 36:10  <b>Sent</b> - 114:1  <b>Separate</b> - 14:11, 23:12  <b>September</b> - 113:8, 113:17, 114:7, 114:15  <b>Series</b> - 81:18  <b>Serve</b> - 45:5, 71:5  <b>Served</b> - 109:5  <b>Servers</b> - 38:23  <b>Serves</b> - 120:13  <b>Service</b> - 22:1, 22:20, 22:24, 22:25, 23:14, 39:10, 40:1, 40:5, 40:6, 59:16, 59:17, 63:3, 66:24, 67:1, 67:4, 67:19, 68:24, 70:19, 70:21, 70:24, 71:7, 71:13, 72:2, 72:14, 72:15, 72:19, 72:23, 73:1, 73:11, 78:25, 80:22, 81:10, 88:13, 88:23, 89:13, 89:15, 89:19, 94:4, 94:7, 95:1, 104:3, 104:14, 107:1, 118:22, 119:7, 120:1, 123:2  <b>Services</b> - 37:12, 40:22, 44:4  <b>Set</b> - 2:15, 2:24, 4:7, 26:14, 31:7, 97:11, 97:12  <b>Setting</b> - 3:17, 57:2, 91:15  <b>Settlement</b> - 59:1, 59:4, 110:21, 111:5, 111:24, 112:8, 112:11  <b>Seven</b> - 54:4, 56:13  <b>Sever</b> - 69:17, 113:11  <b>Severe</b> - 12:16, 18:17  <b>Shift</b> - 31:1  <b>Show</b> - 8:17  <b>Showed</b> - 6:11, 6:22  <b>Shown</b> - 2:18, 95:25  <b>Shrubs</b> - 55:8  <b>SIEM</b> - 39:25, 40:5, 40:6</p>
--	---	---	--	---

<p><b>Signal</b> - 89:20, 90:22, 91:10, 93:12, 102:24  <b>Signalling</b> - 84:4  <b>Signals</b> - 85:9, 86:24, 88:3, 88:7, 89:9, 90:10, 90:18  <b>Significant</b> - 16:14, 29:15, 29:24, 30:14, 31:15, 31:18, 33:5, 34:19, 42:9, 45:13, 50:20, 54:21, 58:1, 61:15, 61:23  <b>Significantly</b> - 30:25  <b>Similar</b> - 6:19, 16:22, 16:24, 18:24, 23:20, 43:1, 70:1, 111:8  <b>Similarly</b> - 10:12, 43:19, 104:19  <b>Simmons</b> - 6:10, 10:8, 123:18, 123:19, 126:19  <b>Simple</b> - 36:6  <b>Simply</b> - 96:3, 116:17  <b>Singular</b> - 85:1  <b>Sit</b> - 27:23, 28:4  <b>Site</b> - 76:8  <b>Six</b> - 116:3  <b>Size</b> - 44:6, 50:12  <b>Skilled</b> - 37:6  <b>Skills</b> - 40:25, 41:1, 41:5  <b>Slight</b> - 3:13  <b>Slips</b> - 27:13  <b>Smart</b> - 117:11, 117:15, 118:2, 118:7, 118:12  <b>Snowmageddon</b> - 16:15  <b>Soft</b> - 27:12  <b>Software</b> - 36:13, 40:7, 42:1, 43:1, 44:17, 44:23, 44:24, 45:11, 46:17, 63:16  <b>Solely</b> - 85:2  <b>Solution</b> - 49:2, 49:3, 63:15  <b>Solutions</b> - 46:24, 48:14, 48:23  <b>Somewhat</b> - 106:19  <b>Sounds</b> - 110:13</p>	<p><b>Source</b> - 120:21, 121:6  <b>Specific</b> - 16:19, 20:24, 26:19, 31:8, 59:9, 63:7, 64:13  <b>Spent</b> - 122:7  <b>St</b> - 66:15  <b>Stability</b> - 91:22, 98:11  <b>Stable</b> - 104:4, 105:11, 107:8, 107:14  <b>Stakeholder</b> - 32:3  <b>Stakeholders</b> - 30:7, 30:9, 30:18, 30:22, 108:10  <b>Stand</b> - 117:24  <b>Standard</b> - 12:21, 12:23, 13:1, 13:2, 13:5, 26:14, 26:21, 70:25  <b>Standards</b> - 12:14, 12:19, 27:3  <b>Start</b> - 8:19, 13:1, 115:21  <b>Started</b> - 22:11, 75:11, 75:16, 75:20, 75:23, 109:14, 112:11, 115:5  <b>Starting</b> - 20:12, 21:1  <b>Starts</b> - 26:17  <b>State</b> - 28:10, 28:14, 28:21, 28:22, 29:8  <b>Statement</b> - 8:13, 9:11, 84:17, 100:7  <b>Status</b> - 25:23  <b>Steered</b> - 48:16  <b>STEPHEN</b> - 74:13  <b>Steps</b> - 28:24  <b>Steve</b> - 74:21  <b>STI</b> - 2:20, 77:17, 77:20, 77:23, 77:25  <b>Stop</b> - 24:13, 39:9  <b>Storm</b> - 8:11, 14:13  <b>Storms</b> - 4:23, 7:24, 9:2, 14:3, 14:9, 14:12, 15:2, 37:23, 37:24  <b>Stormy</b> - 4:18  <b>Straight</b> - 80:12  <b>Straightforward</b> - 76:24, 85:24, 86:1, 86:3  <b>Strategies</b> - 26:19  <b>Strategy</b> - 16:20,</p>	<p>16:22, 18:9, 18:21, 26:18, 26:19, 46:23, 48:9, 51:9  <b>Street</b> - 21:23  <b>Strengthens</b> - 12:22  <b>Strong</b> - 8:5, 14:15  <b>Structure</b> - 69:1, 85:4, 89:7, 90:7, 103:2, 105:1, 116:6  <b>Structured</b> - 92:8  <b>Structures</b> - 84:3, 110:3  <b>Studies</b> - 94:2, 110:1, 118:1, 118:23, 119:11, 119:17, 120:4, 120:8, 120:9  <b>Study</b> - 60:18, 67:1, 70:21, 71:7, 71:13, 105:24, 106:16, 107:1, 112:13, 115:23, 117:17, 117:22, 119:23  <b>Subdivisions</b> - 21:9  <b>Submission</b> - 2:2  <b>Submissions</b> - 1:10  <b>Subsequent</b> - 4:2, 7:4  <b>Subsidization</b> - 71:12  <b>Substation</b> - 12:13, 20:3, 20:17, 36:15, 120:11, 120:13, 120:20, 120:24, 121:5, 122:8, 122:17, 122:25, 124:10, 125:5  <b>Substations</b> - 15:20  <b>Sufficient</b> - 21:20, 126:7  <b>Suggested</b> - 101:12  <b>Superintendent</b> - 66:14  <b>Supplied</b> - 125:4  <b>Supply</b> - 61:20, 66:3, 66:17, 76:12, 95:19, 96:13, 96:25, 120:21, 121:6, 123:1, 124:11, 124:15, 125:3</p>	<p><b>Support</b> - 16:7, 16:9, 37:19, 40:23, 58:14, 59:10, 59:16, 118:24  <b>Supported</b> - 43:9, 43:13, 43:17, 125:7, 125:11  <b>Supports</b> - 38:7, 119:15  <b>Suppose</b> - 102:7  <b>Surprised</b> - 125:18  <b>Suspicious</b> - 38:24  <b>Sustainable</b> - 50:6  <b>Sway</b> - 10:18  <b>Swings</b> - 8:18  <b>Switch</b> - 19:10  <b>Switching</b> - 27:13  <b>System</b> - 4:11, 4:22, 7:24, 12:9, 12:22, 12:25, 13:4, 14:5, 15:3, 15:7, 15:8, 15:13, 15:17, 15:24, 18:1, 18:18, 19:13, 20:6, 21:1, 22:8, 22:11, 22:13, 27:2, 27:24, 33:12, 36:14, 37:8, 38:3, 38:23, 40:21, 40:23, 41:3, 43:12, 43:14, 43:18, 47:12, 47:13, 48:2, 49:1, 49:6, 56:3, 68:2, 68:20, 70:12, 70:13, 80:9, 83:1, 83:3, 83:5, 83:6, 95:4, 100:15, 101:23, 102:4, 102:9, 103:4, 103:16, 103:18, 107:4, 110:8, 115:17  <b>Systems</b> - 15:4, 33:15, 34:8, 37:7, 48:17, 75:15</p> <div style="border: 1px solid black; text-align: center; width: fit-content; margin: 10px auto;"> <p><b>T</b></p> </div> <p><b>Table</b> - 95:17, 95:25, 96:10, 96:12, 124:22  <b>Tabletop</b> - 14:10  <b>Tail</b> - 70:10, 87:9, 88:12, 88:22, 88:24, 89:2, 93:13, 93:15, 94:3, 94:8, 94:20, 95:1, 95:20, 95:22, 96:6, 96:8, 97:11, 99:1, 100:22,</p>	<p>101:20, 104:1, 104:7  <b>Tailored</b> - 12:14  <b>Taking</b> - 13:16, 79:8  <b>Target</b> - 2:23, 3:5, 3:13, 3:14, 4:1, 4:7, 4:21, 4:23, 5:3, 7:3, 7:5, 7:18, 7:21, 8:4, 8:21, 9:25, 10:2, 28:9, 28:14, 28:21, 29:8, 118:20, 119:4  <b>Targets</b> - 2:15, 2:25, 3:4, 3:17, 35:21  <b>Task</b> - 110:14  <b>Team</b> - 10:3, 27:9, 27:10, 28:4, 66:16  <b>Technical</b> - 91:7  <b>Technologies</b> - 31:15, 37:11, 43:7, 43:20, 43:24, 44:5, 44:11, 44:18, 45:5, 63:10  <b>Technologists</b> - 13:14  <b>Technology</b> - 9:24, 14:23, 14:24, 31:5, 33:12, 38:4, 38:13, 38:14, 38:15, 38:19, 39:2, 40:6, 40:8, 40:9, 40:12, 43:1, 43:3, 43:4, 43:5, 43:11, 44:2, 44:14, 44:16, 44:22, 45:9, 47:6, 47:7, 47:8, 47:10, 47:17, 49:10, 49:14, 50:3, 50:4, 59:15, 59:21, 63:1, 63:2, 63:14  <b>Telling</b> - 22:6  <b>Tells</b> - 106:18  <b>Ten</b> - 99:1  <b>Term</b> - 5:11, 7:19, 8:3, 41:4, 41:8, 50:9, 63:18, 77:3  <b>Terms</b> - 7:15, 8:12, 9:9, 9:23, 10:23, 10:25, 15:6, 17:9, 19:17, 27:12, 27:19, 27:25, 44:7, 51:11, 51:22, 52:9, 56:19, 60:24, 63:4, 63:5, 63:9, 86:4, 118:7  <b>Territory</b> - 18:2,</p>
--	--	---	--	---

<p>23:14  <b>Test</b> - 32:18, 33:20, 34:5, 34:12, 42:11, 46:11, 46:12, 49:23, 58:2  <b>Testimony</b> - 66:22, 67:2, 74:5, 74:23, 79:20, 126:24  <b>Testing</b> - 37:2  <b>Thanks</b> - 1:18  <b>That's</b> - 3:2, 3:9, 3:21, 4:17, 5:14, 6:16, 7:1, 7:7, 8:10, 9:20, 10:22, 11:12, 12:9, 12:18, 14:1, 18:13, 21:13, 21:18, 23:21, 24:8, 24:25, 25:10, 27:20, 28:10, 28:25, 29:4, 29:6, 29:12, 31:25, 32:1, 32:14, 32:24, 33:9, 33:17, 34:4, 36:18, 37:3, 37:16, 37:18, 38:8, 39:10, 39:18, 39:22, 40:21, 42:18, 43:7, 43:24, 44:23, 44:24, 45:2, 46:3, 46:10, 47:1, 48:7, 49:21, 51:5, 52:7, 53:3, 53:14, 53:15, 53:16, 53:21, 54:7, 54:9, 54:12, 54:17, 55:14, 55:17, 57:23, 58:20, 58:21, 59:4, 59:7, 62:7, 64:21, 75:3, 76:13, 76:15, 77:8, 77:16, 77:20, 78:11, 79:15, 79:17, 79:19, 81:24, 82:1, 84:1, 85:12, 86:4, 88:4, 89:21, 91:7, 92:23, 93:2, 94:24, 98:18, 100:19, 101:5, 101:15, 106:17, 106:23, 111:23, 113:14, 115:8, 116:7, 118:16, 120:17, 121:17, 122:23, 123:5, 124:16, 124:23, 125:13, 126:25  <b>There's</b> - 4:16, 4:18, 7:18, 8:8,</p>	<p>10:24, 12:6, 22:21, 22:24, 23:2, 24:6, 28:23, 38:24, 40:8, 40:18, 41:10, 41:13, 44:21, 52:4, 52:13, 52:17, 58:6, 59:12, 59:17, 60:3, 60:8, 61:10, 77:2, 80:19, 80:23, 85:5, 90:25, 91:3, 98:14, 98:16, 100:7, 101:12, 101:15, 102:10, 104:11, 104:23, 104:25, 108:1, 108:4, 108:5, 110:8, 110:24, 114:13, 116:16, 125:2, 125:3  <b>These</b> - 13:16, 14:4, 14:15, 18:11, 24:5, 33:13, 39:13, 42:3, 42:15, 42:21, 43:23, 44:11, 46:5, 47:2, 49:17, 50:7, 50:15, 54:19, 57:22, 58:17, 62:1, 69:20, 73:4, 74:1, 107:12  <b>They'd</b> - 30:18  <b>They're</b> - 6:23, 13:16, 15:23, 21:11, 22:6, 23:1, 36:3, 39:3, 39:14, 42:1, 43:21, 50:13, 51:14, 52:3, 56:13, 62:17, 94:9, 102:23, 116:10  <b>They've</b> - 9:25, 16:11, 16:16  <b>Third</b> - 39:1, 45:10, 52:24  <b>Thorough</b> - 116:21  <b>Thousands</b> - 85:14  <b>Threat</b> - 35:21  <b>Threats</b> - 45:7, 50:11  <b>Three</b> - 7:21, 9:17, 47:3, 49:23, 51:21, 53:8, 53:14, 58:22, 60:16, 81:11  <b>Threshold</b> - 4:17  <b>Time</b> - 8:16, 9:15, 12:23, 24:12, 29:23, 30:2, 31:9, 47:7, 56:16, 56:22, 58:22, 67:11, 70:12,</p>	<p>81:23, 90:5, 109:9, 111:2, 111:7, 126:7  <b>Timeframe</b> - 84:14, 111:18, 111:20  <b>Times</b> - 23:2, 53:2, 62:16  <b>Timing</b> - 112:3, 116:15  <b>Tissue</b> - 27:12  <b>Today</b> - 1:16, 2:14, 43:16, 44:15, 60:17, 127:3  <b>Tomorrow</b> - 126:1, 126:14, 126:25, 127:3  <b>Took</b> - 6:10, 10:8, 49:5  <b>Topic</b> - 19:4, 25:18, 100:5, 120:9  <b>Topics</b> - 42:1  <b>Total</b> - 34:23, 41:18  <b>Touch</b> - 39:7, 39:8  <b>Tougher</b> - 89:23  <b>Towards</b> - 113:21  <b>Tracking</b> - 15:10, 23:17  <b>Traffic</b> - 38:20, 38:22  <b>Transcript</b> - 100:6  <b>Transformer</b> - 20:3, 20:18, 21:25, 23:4, 23:5, 120:14, 120:15, 120:20, 120:23, 121:4, 121:13, 121:16, 122:1, 122:3, 122:18, 122:20, 122:23, 122:25, 124:9, 124:11  <b>Transformers</b> - 20:11, 22:14, 24:19  <b>Transmission</b> - 12:12, 13:15, 51:13, 54:14, 73:16, 78:25  <b>Transparent</b> - 88:9  <b>Treated</b> - 73:6, 73:23  <b>Treating</b> - 71:21  <b>Tree</b> - 51:23, 52:13, 53:3, 53:7  <b>Trees</b> - 51:14, 51:19, 52:1, 53:1, 53:23, 55:17, 56:3, 57:5  <b>Trend</b> - 6:12, 6:19, 10:9, 10:13, 12:1  <b>Trending</b> - 6:21,</p>	<p>6:23  <b>Trends</b> - 27:15, 28:3  <b>Trick</b> - 90:24  <b>Trigger</b> - 31:14  <b>Trimmed</b> - 53:23  <b>Trimming</b> - 51:23  <b>Trouble</b> - 15:24  <b>Truck</b> - 15:11  <b>Trucks</b> - 15:10, 15:15  <b>Turn</b> - 91:25, 107:18  <b>Turned</b> - 5:24  <b>Turning</b> - 50:18  <b>Twice</b> - 54:4, 56:12  <b>Two</b> - 9:17, 12:6, 20:15, 35:3, 40:8, 40:18, 41:10, 68:22, 72:20, 80:19, 84:9, 85:7, 86:4, 99:13, 115:8, 115:12  <b>Types</b> - 18:11, 22:17, 47:3, 58:17, 91:22, 117:7  <b>Typically</b> - 31:19, 48:16  <div style="border: 1px solid black; text-align: center; width: 100px; margin: 10px auto;">U</div> <b>Uncertainties</b> - 80:9, 82:25, 83:12  <b>Uncertainty</b> - 92:11, 107:3  <b>Unchanged</b> - 84:5  <b>Undergoing</b> - 107:15  <b>Undertake</b> - 113:17  <b>Undertaken</b> - 118:1  <b>Undertaking</b> - 41:15, 41:22, 61:2, 61:7, 69:11, 105:24  <b>Underway</b> - 28:23, 68:1  <b>Undue</b> - 71:12  <b>Unduly</b> - 73:24  <b>Unfolding</b> - 32:2  <b>Unintended</b> - 70:7  <b>University</b> - 74:25, 75:4, 120:24, 120:25, 121:2, 121:9, 121:15, 122:16, 123:2  <b>Unless</b> - 62:13  <b>Unplanned</b> - 53:1, 57:16  <b>Unplug</b> - 39:9</p>	<p><b>Unsupported</b> - 43:22  <b>Unsuspecting</b> - 36:11  <b>Update</b> - 25:21, 60:7  <b>Updated</b> - 25:15, 113:25, 115:22  <b>Updates</b> - 30:11, 30:19  <b>Upfront</b> - 14:8, 18:22, 23:21, 72:13, 72:18  <b>Upgrade</b> - 22:1, 22:3, 23:6, 120:13  <b>Upgraded</b> - 47:12  <b>Upgrades</b> - 20:13, 20:24, 22:20, 41:2, 46:6  <b>Used</b> - 5:23, 6:5, 15:16, 63:2, 72:12, 79:17, 79:19, 87:11, 124:24  <b>Using</b> - 4:3, 9:14, 36:7, 47:17, 50:24, 102:8  <b>Utilities</b> - 13:25, 14:20, 16:18, 17:2, 19:7, 35:20, 39:4, 86:4, 99:13  <b>Utility</b> - 17:6, 85:1, 86:6, 88:15, 88:25, 89:4, 92:12, 92:15, 96:21, 100:23, 101:19, 102:1, 116:11  <b>Utility's</b> - 71:1  <div style="border: 1px solid black; text-align: center; width: 100px; margin: 10px auto;">V</div> <b>Variability</b> - 8:9, 10:22, 63:18  <b>Variance</b> - 95:24, 96:13, 96:25  <b>Variances</b> - 97:18  <b>Variation</b> - 8:17  <b>Vary</b> - 10:16  <b>Varying</b> - 77:21  <b>Vegetation</b> - 50:20, 51:9, 51:11, 53:11, 54:23, 56:6, 56:20, 57:3, 57:4  <b>Vehicle</b> - 15:10, 19:24, 20:21, 21:22, 21:23, 23:8  <b>Vehicles</b> - 20:20, 22:7, 23:23, 24:6  <b>Vendor</b> - 43:12,</p>
---	--	--	--	--

<p>43:16  <b>Vendors</b> - 43:8  <b>Versa</b> - 14:21  <b>Version</b> - 43:15  <b>Versus</b> - 20:8,  49:3, 49:23, 99:12  <b>Vice</b> - 14:21, 124:3  <b>View</b> - 56:9, 97:5  <b>Visit</b> - 52:15  <b>Volatility</b> - 97:21,  101:9  <b>Volume</b> - 67:1  <b>Vulnerabilities</b> - 36  :4  <b>Vulnerability</b> - 45:1  0</p> <p style="text-align: center;"><b>W</b></p> <p><b>Wait</b> - 125:23  <b>Wants</b> - 1:7  <b>Warmed</b> - 76:11  <b>Wasn't</b> - 111:9,  121:20  <b>Watching</b> - 17:23  <b>Ways</b> - 19:22, 37:7  <b>Weaknesses</b> - 37:1  1  <b>Weather</b> - 4:15,  8:12, 8:20, 10:23,  11:3, 11:8, 12:7,  12:10, 12:16, 13:6,  18:17  <b>Website</b> - 36:7  <b>We'd</b> - 30:21  <b>Week</b> - 1:23, 1:24  <b>Weight</b> - 20:8  <b>We'll</b> - 51:1, 52:22,  57:7, 59:10, 60:14,  86:14, 89:4, 90:15,  97:2, 99:16,  109:17, 123:23  <b>We're</b> - 1:16, 1:22,  4:22, 6:2, 9:12,  9:14, 9:16, 9:19,  10:19, 18:19,  18:21, 21:15,  22:12, 22:16,  24:10, 25:11, 27:11,  27:25, 28:14,  30:22, 31:22,  31:23, 35:3, 35:6,  44:2, 44:9, 44:16,  45:19, 49:14,  52:22, 53:12, 55:11,  59:19, 60:17,  60:18, 60:20, 62:8,  63:14, 63:17, 64:4,</p>	<p>64:6, 84:1, 87:19,  87:22, 91:16,  92:19, 93:8, 94:25,  95:11, 97:16, 104:6,  105:12, 105:19,  106:13, 107:5,  108:1, 108:3,  108:4, 108:7,  108:18, 109:11,  109:23, 109:24,  110:11, 110:19,  111:10, 111:13,  112:4, 115:23,  115:24, 116:5,  116:13, 119:14,  122:24, 125:18  <b>Weren't</b> - 113:16  <b>West</b> - 13:20  <b>Westcoast</b> - 17:15  <b>We've</b> - 8:12, 8:17,  9:8, 12:20, 13:11,  14:6, 14:24, 16:13,  16:25, 17:1, 17:16,  17:19, 17:20,  17:23, 17:24,  18:19, 19:15,  20:14, 20:23, 22:11,  24:21, 25:16,  26:12, 27:18,  31:14, 31:24,  32:19, 35:12,  36:17, 36:25, 37:1,  39:1, 45:13, 48:16,  49:22, 52:7, 53:4,  53:12, 53:19,  59:23, 61:9, 62:9,  63:1, 63:8, 86:8,  97:21, 114:21,  118:6  <b>What's</b> - 9:6,  17:23, 25:12,  27:24, 44:7, 55:11,  79:17, 79:19, 89:2  <b>Whereas</b> - 24:5  <b>Wholesale</b> - 80:10,  84:10, 84:13,  84:22, 85:4, 85:8,  85:23, 85:25, 87:2,  87:5, 87:10, 89:7,  92:2, 92:4, 92:8,  92:20, 93:2, 93:14,  95:21, 96:3, 96:7,  96:18, 96:20,  96:23, 97:7, 97:10,  97:17, 100:8,  100:17, 100:18,  100:21, 101:7,</p>	<p>102:15, 102:21,  103:2, 115:16,  116:6  <b>Wildfire</b> - 18:2  <b>Wildfires</b> - 17:22  <b>Will</b> - 1:15, 1:25,  19:8, 23:23, 25:7,  27:23, 28:4, 28:7,  32:16, 39:6, 42:7,  42:14, 43:8, 43:16,  49:18, 52:14,  52:15, 58:9, 59:2,  60:2, 61:2, 62:23,  65:8, 66:19, 67:2,  69:23, 70:2, 70:18,  72:13, 72:16,  92:12, 92:15,  100:13, 100:14,  102:2, 102:11,  102:14, 102:16,  102:22, 103:6,  103:14, 103:15,  103:19, 103:22,  116:22, 127:3  <b>Wind</b> - 17:7  <b>Withstand</b> - 12:10,  13:6  <b>Witness</b> - 65:13,  65:15, 123:20,  125:22  <b>Witnesses</b> - 65:9  <b>Won't</b> - 57:4,  62:12, 102:12  <b>Word</b> - 101:1,  102:8  <b>Words</b> - 106:10  <b>Work</b> - 7:23, 8:1,  8:2, 8:6, 8:23, 14:7,  15:14, 15:16,  47:14, 47:22, 52:9,  53:11, 53:16, 55:12,  57:17, 75:14, 76:3,  113:21, 114:2,  114:14, 115:6,  116:16, 117:5  <b>Worked</b> - 35:24,  113:20  <b>Workforce</b> - 15:13,  47:12, 48:1  <b>Working</b> - 1:16,  85:3, 85:7, 86:5,  107:10, 114:21  <b>Works</b> - 9:4  <b>Worth</b> - 18:13,  55:23, 57:17  <b>Worthwhile</b> - 47:18  <b>Wouldn't</b> - 4:24,</p>	<p>97:23, 98:19</p> <p style="text-align: center;"><b>Y</b></p> <p><b>Year</b> - 3:14, 3:18,  4:2, 4:4, 4:8, 5:6,  5:25, 6:7, 6:23, 7:3,  7:4, 7:5, 7:17, 7:20,  8:4, 8:10, 8:11,  8:19, 9:5, 9:18,  10:17, 10:18,  10:19, 10:22,  10:23, 13:17, 20:2,  20:16, 22:12, 23:11,  24:17, 25:3, 25:13,  25:14, 25:15,  25:16, 27:10,  27:18, 27:19,  32:18, 33:20, 34:5,  34:12, 36:18, 42:11,  44:14, 46:11, 46:12,  47:11, 49:2, 49:23,  53:13, 53:20, 54:4,  54:15, 56:13, 57:7,  57:8, 57:14, 58:2,  58:22, 60:2, 92:19,  113:4  <b>Years</b> - 5:7, 5:21,  5:22, 7:13, 8:14,  9:9, 9:18, 10:1,  12:21, 13:3, 16:13,  20:15, 20:25,  21:18, 21:20,  21:21, 25:15, 26:6,  26:9, 30:24, 35:13,  35:15, 37:1, 38:16,  41:3, 47:3, 49:23,  52:8, 52:23, 53:14,  59:21, 60:16, 62:11,  64:1, 64:3, 72:20,  75:13, 75:16,  77:18, 92:11, 92:12,  97:21, 116:3  <b>Yesterday</b> - 1:14,  2:12, 6:11, 15:5,  26:3, 26:11, 55:19,  62:5, 117:24,  118:19, 123:6,  124:13, 125:20  <b>You'd</b> - 67:7  <b>You'll</b> - 38:9, 55:20  <b>You're</b> - 4:3, 10:25,  11:12, 13:18, 27:6,  34:21, 40:6, 43:6,  50:3, 55:16, 55:18,  56:12, 57:2, 57:6,  57:13, 62:20, 76:11,  85:17, 85:22,</p>	<p>89:25, 90:15,  91:15, 93:1, 94:6,  98:24, 98:25, 99:2,  101:20, 102:10,  105:24  <b>You've</b> - 11:21,  18:7, 32:7, 33:3,  62:16, 103:21,  106:8</p> <p style="text-align: center;"><b>Z</b></p> <p><b>Zero</b> - 96:1  <b>Zone</b> - 13:17  <b>Zones</b> - 13:12,  17:19</p>
--	---	---	---	---