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1 (9:00 a.m.)
 2 CHAIR:
 3 Q. Good morning everyone. Any preliminary
 4 matters?
 5 MS. GLYNN:
 6 Q. Yes, Mr. Chair. Newfoundland Power has a
 7 preliminary matter that they wish to
 8 address.
 9 MR. O'BRIEN:
 10 Q. Yes, Mr. Chair. I've been asked just for
 11 clarification purposes to summarize sort of
 12 our proposal with respect to rebasing, and
 13 the proposal essentially is the 5.5 percent
 14 increase for 2025, 2026 with rebasing to be
 15 on either the outcome of the September
 16 application for the wholesale rate change or
 17 if that's not approved, then the existing
 18 wholesale rate, right now, could be rebased
 19 to that. So that's essentially the
 20 proposal, if that clarifies things for you.
 21 CHAIR:
 22 Q. Okay.
 23 MS. GLYNN:
 24 Q. And, Mr. Chair, just to advise all the
 25 parties that we had a quick discussion

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1 before we started and counsel will have a
 2 discussion on submission—written submission
 3 dates after the hearing.
 4 CHAIR:
 5 Q. Okay, we're good? All right, so we'll move
 6 on to Mr. Bowman.
 7 FITZGERALD, KC:
 8 Q. Mr. Chair, prior to that, I mentioned to Mr.
 9 O'Brien this morning we do have another
 10 slight matter. We did receive the response
 11 to Undertaking No. 8 yesterday in a timely
 12 fashion. We've reviewed it, we just want to
 13 qualify one more question on that. We've
 14 been advised now by the undertaking that the
 15 purchase order for the smart meters occurred
 16 on September 14th, 2023. We would just like
 17 a qualification of that or expance or
 18 amplification of that to advise us when in
 19 fact these smart meters or in fact the smart
 20 meters have arrived as a result of that
 21 order.
 22 MR. BOWMAN:
 23 A. So the purchase order for the meters for the
 24 load research program.
 25 MR. O'BRIEN:

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1 Q. And we can do that to advise when or if they
 2 have been received.
 3 CHAIR:
 4 Q. Okay, so we'll just have the undertaking
 5 updated.
 6 MR. O'BRIEN:
 7 Q. Well do that, or we can do it in a separate
 8 undertaking, if you want to do it that way.
 9 CHAIR:
 10 Q. Sure.
 11 MS. GLYNN:
 12 Q. Yes, I think we'll do a separate undertaking
 13 for the delivery date, if they had been
 14 delivered –
 15 MR. O'BRIEN:
 16 Q. Sure, if they had been delivered.
 17 FITZGERALD, KC:
 18 Q. Thank you, Mr. Chair.
 19 CHAIR:
 20 Q. So, Mr. Bowman, I hear you're to be
 21 affirmed. Good morning and welcome back to
 22 Newfoundland.
 23 MR. DOUG BOWMAN (AFFIRMED)
 24 CHAIR:
 25 Q. And it's over to you, Mr. Fitzgerald—or Mr.

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1 Browne, sorry.
 2 MR. DOUG BOWMAN, EXAMINATION-IN-CHIEF BY MR. DENNIS
 3 BROWNE, KC
 4 Q. Good morning, Mr. Bowman. Do you adopt your
 5 evidence as filed in this proceeding?
 6 MR. BOWMAN:
 7 A. I do.
 8 BROWNE, KC:
 9 Q. Just review your qualifications and resumé
 10 and then you can make an opening statement,
 11 that's the process we're following. In
 12 terms of your resumé and your resumé we'll
 13 find it at page 53 of your evidence in the
 14 appendices to your evidence, it gives your
 15 qualifications and the last page of that
 16 gives a brief resumé. Can you just take us
 17 through that, what your resumé is, you began
 18 training as an engineer and end up doing
 19 engineering consulting and electricity
 20 consulting and energy consulting generally.
 21 MR. BOWMAN:
 22 A. Okay, as it shows on my Exhibit CDB1, I
 23 start out in Ontario Hydro, I started as an
 24 engineer in training. I moved on to
 25 transmission planning for a couple of years

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1 and generation planning. I was in
 2 operations for a period of time, both
 3 generation and transmission operations. I
 4 moved on to as an industrial customer
 5 service representative for awhile, and then
 6 I did rate design for a couple of years as
 7 well. And after that, I left Ontario Hydro,
 8 I joined CSA Energy Consultants which is
 9 Casazza Shultz and Associates. We did
 10 mostly rate design work and transmission
 11 type work at that consulting firm. After
 12 that, I went to, I think KEMA, I spent some
 13 time with KEMA Consulting doing similar type
 14 work. I also worked for Nexant for a short
 15 period of time and PACE Global Energy
 16 Services and in about 2004, I went out as an
 17 independent consultant.
 18 BROWNE, KC:
 19 Q. In your role as an energy consultant, as
 20 indicated in your resumé, page 53 you
 21 travelled widely. You mentioned Armenia,
 22 Australia, Central America, China, Columbia,
 23 the Dutch Antilles, Egypt and Georgia,
 24 Gauna, Indian-Indonesia, Macedonia, Mexico,
 25 Middle East, Mongolia, Pakistan,

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1 Philippines, Russia and Saudia Arabia,
 2 Serbia, South Korea and Taiwan, Thailand,
 3 United States and Vietnam and now you're
 4 here with us.
 5 MR. BOWMAN:
 6 A. Yes.
 7 BROWNE, KC:
 8 Q. And this is not your first time giving
 9 expert evidence here before this Board?
 10 MR. BOWMAN:
 11 A. No, I've given expert testimony here, I
 12 think around ten times, I think it's stated
 13 on my CV there, both on behalf of the
 14 Consumer Advocate and both Newfoundland
 15 Power and NL Hydro applications.
 16 BROWNE, KC:
 17 Q. And you've also given evidence before the
 18 Nova Scotia Board?
 19 MR BOWMAN:
 20 Q. That's right, it was on rate design and cost
 21 of service.
 22 BROWNE, KC:
 23 Q. And in your expert testimony at Nova Scotia
 24 in the power rates submission that you made
 25 there, it states on page 54 under "Expert

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1 Testimony of Nova Scotia", that you were
 2 involved in the recommended design time of
 3 day rates for all customers, is that
 4 correct?
 5 MR. BOWMAN:
 6 A. That's right.
 7 BROWNE, KC:
 8 Q. And in other countries, I'm sort of, I find
 9 it interesting where you've been and what
 10 you've been doing. On page 55 it states you
 11 did pricing methodologies for use of the
 12 Pan-Arab electricity market. Can you tell
 13 us a little bit about that, what you were
 14 doing there?
 15 MR. BOWMAN:
 16 A. Yeah, there's 22 Arab countries, they're all
 17 trying to form a regional electricity market
 18 and as part of a study, the initial project
 19 they did on that was reviewed the power
 20 systems in each of those 22 countries,
 21 summarized capacity and demand analysis and
 22 recommended a regional electricity market
 23 for trade amongst the Arab countries. At
 24 the time I started, they were all pretty
 25 much short of capacity, so they weren't

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1 doing much trade. They should have been
 2 doing some trade to help each other out
 3 because there was some diversity between the
 4 load profiles of the different countries.
 5 But then as part of that, part of that
 6 study, I recommended an ultimate market
 7 design, remarket design, and then an initial
 8 market design one that they would proceed
 9 from over time. Now the documentation with
 10 that included a general agreement which was
 11 more or less a legal agreement, you need a
 12 legal agreement since there's 22 different
 13 countries involved. And then market rules
 14 document, that was to cover the commercial
 15 aspects of the regional market, and then a
 16 grid code which was to cover the technical
 17 aspects of the market. The grid code
 18 includes chapters on planning, operations,
 19 metering and connections.
 20 BROWNE, KC:
 21 Q. You also spent some time in Saudi Arabia,
 22 it's referred in your resumé there, the
 23 formation of an electric hub. Can you tell
 24 us a little about that?
 25 MR. BOWMAN:

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1 A. Yes, Saudi Arabia, everyone knows about
 2 their oil exports and such, they're
 3 certainly a major oil exporter, they don't
 4 import a whole lot but they do use quite a
 5 bit domestically in their power sector.
 6 They want to expand that, they see
 7 themselves as an energy provider, much like
 8 Alberta does here in Canada, and what they
 9 want to do is expand that beyond oil to
 10 include natural gas, liquified natural gas,
 11 and also hydrogen, and they're building a
 12 huge hydrogen facility out in the desert
 13 that will be powered by solar panels during
 14 the day and wind farms during the night, so
 15 they're trying to come up with what's
 16 considered a true green hydrogen, so there's
 17 no fossil fuels involved in that. Now
 18 they're already exporting some hydrogen to
 19 Japan, it's in the form of pneumonia because
 20 there's still some transport issues, it's
 21 highly volatile and that, but they're well
 22 on their way towards proving themselves to
 23 be a total energy hub, rather than just an
 24 oil hub of the future.
 25 BROWNE, KC:

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1 Q. Your resumé also includes work in Western
 2 Australia and market design and market
 3 rules, can you tell us a bit about that?
 4 MR. BOWMAN:
 5 A. Yeah, Eastern Australia already had a
 6 competitive market design, so Western
 7 Australia decided they should do the same
 8 thing. Western Australia is very much
 9 isolated from Eastern Australia, and I
 10 managed a project there to develop a market
 11 design and then develop market rules to
 12 govern that market.
 13 BROWNE, KC:
 14 Q. You did work in Georgia?
 15 MR. BOWMAN:
 16 A. Yeah, I did a number of projects in the
 17 Republic of Georgia. They want to join the
 18 European Union. To do that, you have to
 19 meet the EU requirements. They have a
 20 number of requirements. One, you have to
 21 remove any subsidies from your electricity
 22 tariffs. More importantly, you have to
 23 implement retail competition. Retail
 24 competition requires a whole slew of
 25 documentation. They way they had split it

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1 up, I worked for the regulator itself, the
 2 government was—the ministry of energy was
 3 handling the wholesale market and the
 4 regulator was handling the retail market.
 5 The retail market included things like a
 6 distribution grid code and again, that had
 7 aspects of, it covered planning, operations,
 8 metering and connections. And then I also
 9 developed retail market rules. Now the
 10 retail market rules covered things like
 11 supplier of last resort and switching
 12 suppliers and that sort of thing.
 13 BROWNE, KC:
 14 Q. And you've been involved in the regional
 15 energy integration in the Middle East and
 16 surrounding areas?
 17 MR. BOWMAN:
 18 A. Yeah, and that as kind of a precursor to the
 19 Pan Arab electricity market, so in that
 20 study, Saudi Arabia again is interested in
 21 becoming this energy hub. They are
 22 interested in building enough transmission
 23 to get from Saudi Arabia up to Europe so
 24 they can take advantage of the European
 25 competitive market, and to do that, they had

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1 to go through a number of other Middle
 2 Eastern countries.
 3 BROWNE, KC:
 4 Q. And you've done work on the electricity
 5 market design in Serbia?
 6 MR. BOWMAN:
 7 A. Yes, again, Serbia in that case we developed
 8 market rules, I was also helping train the
 9 regulator, they had a new regulator there, I
 10 was helping them with regulatory process and
 11 actually tariff design.
 12 BROWNE, KC:
 13 Q. And your resumé indicates you do work for
 14 the World Bank.
 15 MR. BOWMAN:
 16 A. Yeah, about, recently—well all that work in
 17 Arab countries, that's done on behalf of the
 18 World Bank. The World Bank is exactly what
 19 they say they are, they're a financial
 20 institution. They lend money to countries
 21 when the private sector will not lend money
 22 to them. So in other words, they fill that
 23 gap, so they take on much riskier clients
 24 and that, but surprisingly they do
 25 exceptionally well. They do earn a return

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1 as much the same as a regular bank, and they
 2 earn enough money to pay consultants, like
 3 myself, to advise them on how they should
 4 invest that money.
 5 BROWNE, KC:
 6 Q. Okay, and the fullness of our resumé is as
 7 stated from page 55 to the end of the
 8 appendix. You're here to present a report
 9 and to give a summary of it. Can you give
 10 us a summary of your evidence or the
 11 highlights that you wish to address, and
 12 I'll leave the rest to you. Thank you.
 13 (9:15 a.m.)
 14 MR. BOWMAN:
 15 A. Okay, now I will kind of go through my
 16 evidence. I won't repeat my evidence, but
 17 I'll try and summarize what I've heard so
 18 far, at least over the last couple of days
 19 and how that influences my evidence now.
 20 First on the wholesale rate and as we've
 21 discussed, that's, that is a settlement
 22 issue. There is a couple of points, though,
 23 I wanted to make on that and that's to be
 24 clear, the wholesale rate applies only to
 25 Newfoundland Power. It doesn't apply to

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1 their retail customers. Now, Newfoundland
 2 Power suggested this will reduce volatility
 3 in rates and I think it will for next year.
 4 I'm not so sure about thereafter and just as
 5 an example, Newfoundland Power's largest
 6 customer class, domestic class, they
 7 currently page 14 cents per kilowatt hour,
 8 more or less. And the current tail-block
 9 charge in the wholesale rate is 18 cents per
 10 kilowatt hour, so that difference is 4 cents
 11 per kilowatt hour. That difference has to
 12 be made up in the July 1st annual adjustment,
 13 RSA MTA adjustment. So what that means is
 14 if Newfoundland Powers sells an additional 1
 15 kilowatt hour above the forecast, that means
 16 it costs them 18 cents per kilowatt hour to
 17 buy that power from Hydro, but in turn—
 18 that's offset by 14 cents per kilowatt hour
 19 additional profit from their customers, so
 20 there's a 4 cent differential there.
 21 Now under the proposed rate, if you
 22 sell an additional kilowatt hour, then
 23 Newfoundland Power, it will cost
 24 Newfoundland Power about 7 cents per
 25 kilowatt hour on an average, it's going to

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1 be split between winner and non-winter,
 2 10.1 in the winter and I think 3.5 in the
 3 off peak (phonetic) or the non-winter. So
 4 that comes out to roughly 7 cents per
 5 kilowatt hour, but if the revenues stay the
 6 same, at least the retail rates stay the
 7 same, that means they'll actually increase
 8 their revenue by 14 cents per kilowatt hour.
 9 That means a 7 cent per kilowatt hour
 10 differential greater than the 4 cents that
 11 it is currently. That implies additional
 12 rate volatility unless you revise those
 13 retail rates as well.
 14 Now, the way this has changed is
 15 certainly in Newfoundland Power's favour
 16 because this way, instead of losing money on
 17 each additional kilowatt hour, they will
 18 gain money on each additional kilowatt hour,
 19 but the volatility, the jury is still out on
 20 that, I'm not sure this is going to decrease
 21 volatility beyond next year.
 22 Now second, and this may have been
 23 discussed with—Ms. Greene stated that owing
 24 to the flow-through application with this,
 25 the Board would be in a position where

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1 there's two outstanding rate increases, one
 2 for the flow-through and one for this GRA.
 3 And that's true, and that is somewhat of an
 4 anomaly, but I will point out that currently
 5 there's two rate applications before the
 6 Board as well, one is 2024 rate of return on
 7 rate base application for 1.5 percent, and
 8 the second is this GRA. So even though it's
 9 rare, it's not unheard of. Load research
 10 study, I asked the Board to give this
 11 highest priority and the reason I did that
 12 is because three winters have passed since
 13 the settlement agreement was signed.
 14 There's not yet been a single datapoint
 15 collected. I know that there's been supply
 16 chain issues and that, but nonetheless, we
 17 want to see that thing get underway, we
 18 don't want to see another winter lost on
 19 that.
 20 Now, connection assets and I'll try to
 21 get through this reasonably quickly, but
 22 let's consider the big substation. The big
 23 substation has 1,334 customers and as far as
 24 I know, one of those is a general service
 25 rate 2.4 customer. And on a basic cost of

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1 service terms, the cost of that substation
 2 need to be allocated to customers. Now the
 3 simple way of looking at that is you take
 4 the cost of the substation and allocate it
 5 to each of those 1,334 customers. Now if
 6 you assume that the cost of that substation
 7 is 4 million dollars, for example, and I'm
 8 not suggesting that that is the cost, but—
 9 well the most recently built substation by
 10 Newfoundland Power was the LPD, Long Pond
 11 substation for about 4.6 million. So for
 12 the sake of argument, let's assume that the
 13 cost of the big substation that would be
 14 allocated to the 1,344 customers is 4
 15 million dollars. Okay, if you take that 4
 16 million and divide it by the 1,344
 17 customers, that gives you an average supply
 18 cost of \$3,000.00 per customer, right.
 19 Okay, now depending on the size of those
 20 customers, some would pay more than that,
 21 some would pay less, but on average it would
 22 be \$3,000.00 per customer.
 23 Now, consider Memorial University, so
 24 you've got two substations serving Memorial,
 25 there's the LPD and the MUN substations.

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1 Now using the same scenario, let's assume
 2 that LPD is about 4 million dollars because
 3 it has one transformer. Let's assume that
 4 the MUN substation, well it has two
 5 transformers, so let's assume it's 5
 6 million. So the difference there is you got
 7 9 million dollars you allocate to one
 8 customer, so 9 million versus \$3,000.00 per
 9 average customer. So that's one of the
 10 reasons you allocate connection cost to the
 11 customer who benefits from the connection,
 12 okay. And when you have like a big
 13 substation where you have 1,344 customers,
 14 that's actually quite common on Newfoundland
 15 Power's system. Hundreds to thousands of
 16 customers are served by most every
 17 substation, except for four and those four,
 18 two of them serve Memorial University, one
 19 of them serves the mine, and the other one
 20 serves another mine, so the LCD, RFD, LPD
 21 and the MUN substations.
 22 So when you have a substation that has
 23 hundreds or thousands of customers, it's
 24 okay to spread that cost around. It's okay
 25 to spread that cost around to several

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1 customers because—to all the customers
 2 because they're all almost the same, like
 3 they probably range, in this case, in this
 4 example, between \$1,000.00 per customer and
 5 \$5,000.00 per customer. That difference is
 6 considered small enough that you can reduce
 7 administration costs by just allocating,
 8 just having the same connection costs for
 9 every customer, collect it all from that
 10 class. Now on the other hand, though, if
 11 you got one customer that costs 9 million
 12 dollars to serve, that no longer makes
 13 sense, you got to hive that off and charge
 14 that cost to the customer and in most every
 15 jurisdiction, well every jurisdiction I'm
 16 aware of that I worked, except for this one,
 17 they do charge customers cost for their own
 18 connections and even Hydro here does that.
 19 It's just Newfoundland Power who doesn't.
 20 Now let's look at this another way. So
 21 in the past three or four years Newfoundland
 22 Power spent 4.6 million developing the LPD
 23 substation, 3.3 million expanding the LPD
 24 substation, 1.6 million on the MUN T2
 25 transformer replacement and 4.4 million on

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1 the MUN substation refurbishment and
 2 modernization project. So this comes out to
 3 a total of 13.9 million. So Newfoundland
 4 Power has spent 13.9 million on the
 5 connection assets for a single customer,
 6 Memorial University and that's over the past
 7 three or four years. Now if Newfoundland
 8 Power has spent 13.9 million on the big
 9 substation, instead of it coming out to a
 10 total of 13.9 million, you'd actually
 11 allocate that to the 1,344 customers, that
 12 would equate to \$10,400.00 per customer. So
 13 again, instead of the 13.9 million, you're
 14 really allocating only \$10,400.00 to each
 15 customer. That's the difference between a
 16 customer connected to the transmission
 17 system and a customer who is connected to
 18 the distribution system.
 19 Now the third way I look at these to
 20 determine whether it should be a connection
 21 asset or not is to go back in history and
 22 see what actually happened and we asked
 23 Newfoundland Power that, and as I recall,
 24 Memorial came about in 1966, I think the
 25 response says, so at that time the

<p style="text-align: right;">Page 21</p> <p>1 university asked to be connected to 2 Newfoundland Power’s system. So in order to 3 do that, they’re a huge load, so you 4 couldn’t just tap into the nearest line, 5 like lines 12L and 14L I understand were in 6 the vicinity, but you couldn’t just tap into 7 either one of those lines because this is a 8 very large load. So what they did was they 9 built the MUN substation. Now if you build 10 the MUN substation, then you have to connect 11 that to something. So that MUN substation 12 was built for one purpose and that was to 13 serve the university and that. Now, you 14 can’t have a substation stand there by 15 itself, so you have lines 12L and 14L, 16 Newfoundland Power at the time decide, well 17 we’ll hook both those lines up to that 18 substation. Now, by hooking both of those 19 lines up to the substation, you had 20 termination costs and you also probably had 21 to expand the capacity of those two lines 22 because they wouldn’t have been carrying 23 that much load. So once you’ve done that 24 then, you’ve got those lines connected, so 25 when you just connect to the substation,</p>	<p style="text-align: right;">Page 23</p> <p>1 really no debate in the industry, everybody 2 requires the customer to pay for that. When 3 you go to a deep connection cost, it gets 4 more complicated because those two lines for 5 example, what is it, L12—sorry 12L and 14L, 6 those two lines when you connected them to 7 that substation, you close the loop around 8 St. John’s. So if you lost load at either 9 the Kingsbridge or the Stamp’s Lane 10 substations, you could still serve the load 11 from the customers because you would 12 backfeed the other way, so that provides 13 benefits to all the customers on the 14 transmission system. If you lose that 15 substation, it doesn’t affect anybody 16 because the loop is still closed and that, 17 you still have the connection going to each 18 of those substations, but you do, you do 19 lose the connection to the university, so 20 the only person affected by that—the only 21 customer affected by a fault at the Memorial 22 substation is Memorial University. 23 Now this issue of deep connection 24 costs is what Hydro is facing up in Labrador 25 with the data centres and that, so Hydro, no</p>
<p style="text-align: right;">Page 22</p> <p>1 that’s what we refer to in the industry as a 2 shallow connection cost, so in other words, 3 you just go from the customer to the nearest 4 point on the transmission system or the 5 distribution system and connect them. So in 6 a typical customer, like the rate 2.4 7 customer served at the big substation, you’d 8 probably just run a line from the plant or 9 the facility to the substation, that might 10 require you to add a circuit breaker at the 11 substation. In that case, the connection 12 cost is quite low, cost of the circuit 13 breaker and whatever the line cost is. In 14 this case, you’re building a whole new 15 substation and line connections and the 16 breakers and associated work that goes with 17 that, now what we refer to when you get to 18 that stage where you’re actually changing 19 the system beyond the connection point, 20 that’s referred to as a deep connection 21 cost; in other words, you go beyond what’s 22 required for the shallow connection. Now 23 when you go to a deep connection cost, there 24 is significant controversy on how you should 25 handle that. Shallow connections, there’s</p>	<p style="text-align: right;">Page 24</p> <p>1 question about connecting them to the 2 system, the issue becomes you’re overloading 3 the system, so you need to reinforce that 4 system. Now in Europe and I like to use 5 Europe because they’ve progressed on this 6 quite a bit more actually than North America 7 and they also publish their information. 8 They got 37 countries and all this 9 information in published in a single report, 10 but I took a look at how they handled it and 11 I think it was all but 8, so say 31, about 12 30 of the countries charge shallow 13 connection costs. Four of them charge 14 shallow and deep connection cost to the 15 customer and four of them say, we’ll look at 16 it on a case-by-case basis. Now whenever 17 I’ve done a transmission tariff for anyone, 18 I’ve always said do it on a case-by-case 19 basis because you don’t want to lock 20 yourself into one or the other. And I say 21 the debate rages on whether you should 22 charge deep connection costs. Deep 23 connection costs are not only of the 24 customer being connected, but also other 25 customers on the system. So if you do</p>

<p style="text-align: right;">Page 25</p> <p>1 charge them deep connection costs, how do 2 you handle that situation? Do they become a 3 transmission owner, like if they pay for 4 that, in theory they own part of that line. 5 Now in competitive markets like PJM, they 6 will actually give the customer transmission 7 rights to use that line, so in effect they 8 do partially own that line. In a regulated 9 market like this, it becomes much more 10 difficult to decide how to handle that, and 11 that's why it's so controversial. So 12 consider the following now, now that's—I 13 tried to give you an overview of how shallow 14 and deep connection costs are covered, but 15 consider this is Newfoundland Power's 16 territory. Now we got two mines served by 17 the RFD and LCD substations. Now they've 18 paid for their connections, but in 19 Newfoundland Power's cost of service study, 20 those connection costs are, of course, taken 21 out, so they've already paid for them. But 22 put back into that cost of service study are 23 the costs of not only the connections of all 24 of the other customers in the rate 2.4 25 class, but the connection costs for both</p>	<p style="text-align: right;">Page 27</p> <p>1 charge distribution because the other 57 or 2 so customers are allocated a distribution 3 cost, they use distribution facilities. So 4 the only way really to handle that is to 5 hive off those three customers from the rate 6 2.4 class and put them in a class of their 7 own so that they won't pay for connections, 8 they'll pay for their own connections, not 9 through the rate and they won't pay 10 distribution costs. Okay, so in summary, 11 Newfoundland Power's policies require a 12 revision to ensure that customers connected 13 to the 66 kV transmission system are 14 responsible for the cost of their 15 connections. They also need to make the 16 changes to the cost of service study I just 17 mentioned. Now the connection cost in 18 recovery should be between the party 19 requesting the connection and Newfoundland 20 Power and the costs should not be included 21 in rate base. Now this is something that I 22 was hired by Ontario Hydro Networks Company 23 back in 2000 to 2002. They had submitted a 24 transmission rate to their regulator there. 25 They had unbundled their power sector to</p>
<p style="text-align: right;">Page 26</p> <p>1 Long Pond and Memorial, Memorial substation, 2 those are huge costs. So what you're doing 3 is you're charging them—really you're 4 charging those two mines twice, they have 5 already paid for their own connections and 6 now they're paying their share of the 7 connection costs for all of the other 8 customers in that class. Now, making 9 matters worse for those two mines, they're 10 also charged distribution costs because most 11 of the customers in the rate 2.4 class are 12 served off the distribution system. So 13 Newfoundland Power has indicated, well we 14 include distribution costs in there, so 15 these two mines are paying not only double 16 connection costs, but they're also paying 17 for distribution facilities that they aren't 18 using. 19 (9:30 a.m.) 20 Now for this reason customer classes 21 are often differentiated by voltage supply 22 level. If you don't hive off these three 23 customers served from the transmission 24 system, there's no way really to not charge 25 distribution costs in there. You have to</p>	<p style="text-align: right;">Page 28</p> <p>1 introduce competition, so the first thing 2 you got to do is define what your 3 transmission system is because everyone is 4 supposed to have equal and non- 5 discriminatory access to the transmission 6 system. So the way you design a 7 transmission tariff and this is what I just 8 did last year for the Arab countries, first 9 identify your objectives. The objectives 10 are the same in any rate design study, you 11 got to recover the revenue requirement, you 12 got to send a efficient price signal and the 13 third one is kind of a catchall, it's 14 implicitly, customer understanding, 15 stability, that sort of thing. That's the 16 first thing you do. 17 The second thing you do is define the 18 transmission system. Normally when I define 19 a transmission system, I include all 20 facilities that are above 50 kV, so that 21 includes lines and stations that are rated 22 above 50 kV and that's more or less what 23 Newfoundland Power is doing, they assume 66 24 kV is transmission voltage. After that when 25 you've defined the transmission system, then</p>

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1 you have to define what's a connection
 2 asset, what's a network asset. Network
 3 asset is what they often refer to as common
 4 in this jurisdiction. That means it
 5 benefits all customers or most customers.
 6 If it benefits only one or a few customers,
 7 that's a connection asset. And that's why I
 8 just went through this whole explanation
 9 because that's part of defining a
 10 transmission tariff. If you've gone through
 11 the development of a tariff, then you would
 12 know this and that was probably the thing
 13 that, I think Ontario Hydro Networks Company
 14 had the most difficulty with because they
 15 had no problem defining what a connection
 16 asset was and no problem with the issue that
 17 the customers who are connected should pay
 18 for those connections. The issue became how
 19 do you recover that money from them. In
 20 their case, about half the customers own
 21 their connections, so they weren't a
 22 problem, and about 25 percent said, well,
 23 we'll buy our connections. Now the other 25
 24 percent, they said, well we don't really
 25 want to put that money out, so what Ontario

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1 Hydro Networks Company did, they formed a
 2 pool of the 25 percent of those customers,
 3 put all the connection costs in there and
 4 then they charged that back to customers in
 5 the form of an annual rate, okay. So
 6 everybody paid their connection costs, it's
 7 just they had two different methodologies
 8 for recovering that cost. Now that's one
 9 reason why we have connection agreements
 10 with customers is to handle just how you're
 11 going to pay those costs back to the
 12 utility. And when you do that, you don't
 13 include those costs in rate base, okay,
 14 that's between the utility and the customer.
 15 Now street and area lighting, and
 16 this isn't something I feel strongly about,
 17 it just struck me that the street and area
 18 lighting customers have benefited
 19 extensively from the LED street lighting
 20 replacement program. They've seen
 21 significant cost reductions. Now no other
 22 customer class has received that significant
 23 cost reduction, and when Newfoundland Power
 24 revised the cost of service study to
 25 incorporate that, it showed that they're

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1 below their cost of supply, so in other
 2 words, they're paying, I think it was about
 3 97 percent of the total cost of supply. It
 4 just struck me as odd why you would give
 5 them this huge break by putting in LED
 6 street lights and then add on to that
 7 subsidy by making them pay only 97 percent
 8 of the cost to supply rather than 100
 9 percent. It just struck me that you should
 10 probably increase that up to 100 percent and
 11 then put those additional revenues towards
 12 one of the classes that's paying out closer
 13 to 110 percent.
 14 Now current rates, Mr. Comerford
 15 yesterday indicated that I was recommending
 16 a change in the rate design for domestic
 17 customers. Now what I actually recommended,
 18 my recommendation No. 7, is that the Board
 19 order Newfoundland Power to cooperate with
 20 Hydro and the Consumer Advocate on the
 21 design of retail rates with tail-block
 22 energy charges that are more reflective of
 23 the marginal cost of energy. This doesn't
 24 necessarily mean changes to the rate
 25 designs, just changes to the charges in the

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1 rate design components to bring rates more
 2 into line with marginal costs. It's
 3 important to reflect trends in marginal
 4 costs and Newfoundland Power's longstanding
 5 rate design expert, Mr. Brockman, that's one
 6 thing he and I agreed—well we agreed on
 7 actually several things, but we both agreed
 8 that marginal costs should be reflected in
 9 rates and we both believe that you should
 10 reflect trends in marginal cost. You can't
 11 go, if marginal costs change quickly, you
 12 can't go straight to marginal cost because
 13 customer impacts, like Mr. Comerford said
 14 yesterday, are too extreme. You don't want
 15 to cause undue harm to customers just by
 16 going to marginal costs. But you don't want
 17 to miss an opportunity to go in that
 18 direction either. Like if you wait for the
 19 end of this rate design study, so you get to
 20 the point in 2026 or 2027, you've decided on
 21 rate designs and you want to move to a rate
 22 that's more reflect the marginal costs, well
 23 then you say, well geez, we're too far away
 24 from that, the customer impacts would be too
 25 extreme. That's why you start doing it now,

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1 so once you get to that point, those
 2 customer impacts aren't as extreme.
 3 Okay, and just to comment further on
 4 one of the comments made by Mr. Comerford
 5 yesterday, he came up with issues with
 6 block-rate structures like we have here now
 7 and even Time-Of-Use rates and making
 8 changes to demand charges versus making
 9 changes to energy charges, and that's all
 10 true. There's no perfect rate design; it's
 11 a balancing act. And in this case I say
 12 there's no perfect rate, on the other hand,
 13 you can always improve rates as well. If
 14 you got a chance to improve rates, you
 15 should take advantage of that opportunity.
 16 And just to be clear on this, like Mr.
 17 Comerford was concerned about customer rate
 18 impacts, but I just have to mention again,
 19 like Newfoundland Power is proposing a 7
 20 percent rate increase and that's 1.5 percent
 21 in 2024 rate of return on rate base
 22 application, another 5.5 percent in this
 23 GRA. And as Ms. Greene pointed out a couple
 24 of times during this hearing, rates are
 25 expected to increase 23 percent over the

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1 next year and 4 days or so. So that's a
 2 significant customer impact, that's, like I
 3 can understand being concerned about
 4 customer rate impacts, but at the same time,
 5 if you're very concerned about that, you
 6 would look for ways to smooth out those rate
 7 impacts and in the July 1st 2024 rate
 8 application, Hydro asked Newfoundland Power
 9 if there's a way to smooth that out.
 10 MR. O'BRIEN:
 11 Q. Mr. Chair, I don't think this is in the
 12 direct evidence filed by this witness.
 13 We're getting into a different area than
 14 what's filed by this witness in the direct
 15 evidence.
 16 CHAIR:
 17 Q. Would you like to comment, Ms. Glynn?
 18 MS. GLYNN:
 19 Q. Yeah, I agree that we are starting to bring
 20 in evidence that's not on this record. I do
 21 think that you can speak to it in a general
 22 way, but I don't think we can get into the
 23 specifics of what's filed on that record.
 24 MR. O'BRIEN:
 25 Q. Okay, and I didn't mean to cut you off, Mr.

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1 Bowman.
 2 FITZGERALD, KC:
 3 Q. Mr. Chairman, I think Mr. Bowman is just
 4 referring to the common theme that we've all
 5 been talking about and that is the 23
 6 percent increase. I don't think there's any
 7 new evidence that he's mentioning here at
 8 all, he's just mentioning one way to
 9 mitigate that and I don't know what elements
 10 of new evidence are actually being
 11 mentioned.
 12 MR. O'BRIEN:
 13 Q. I'm not suggesting there's new evidence, I'm
 14 suggesting it's new evidence to this witness
 15 and this witness can only speak to his
 16 evidence.
 17 BROWNE, KC:
 18 Q. That's not true.
 19 FITZGERALD, KC:
 20 Q. Well any witness can speak to the record and
 21 all of the evidence is on the record
 22 regarding this particular issue. He brings
 23 a certain expertise and a perspective to
 24 that evidence. I don't see any prejudice
 25 whatsoever to Newfoundland Power or to the

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1 Board by Mr. Bowman's comments. It's not—I
 2 don't see the prejudice or I don't see the
 3 illegality of it.
 4 MR. O'BRIEN:
 5 Q. The procedural rules speak to what the
 6 witness can speak to on direct and it's what
 7 the witness has filed in evidence.
 8 CHAIR:
 9 Q. Well I think Mr. Bowman should, you know,
 10 limit his discussions to the evidence in
 11 this application. I know on the July 1st
 12 rate application, which now will be
 13 considered August 1st rate application, the
 14 Consumer Advocate has made his submission
 15 with regard to a proposal for a smoothing
 16 and Hydro has also made a proposal with
 17 respect to smoothing. So we don't want to
 18 rehash that actual discussion here.
 19 MR. O'BRIEN:
 20 Q. And I think that's where I'm going, I mean
 21 in terms of this particular witness is here
 22 to talk about rate design, cost of service,
 23 not smoothing with another application.
 24 CHAIR:
 25 Q. Yeah. So, I think limited to with respect

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1 to this application without getting into the
 2 July 1st application would be helpful.
 3 MR. BOWMAN:
 4 A. Okay.
 5 CHAIR:
 6 Q. Thank you.
 7 MR. BOWMAN:
 8 A. So, I'm just making a point that customer
 9 impact should be smoothed. You should
 10 certainly be concerned about the impacts of
 11 various rate designs on the customers. I'll
 12 leave it at that. Now, with regard to
 13 designing rates, it's difficult to do that
 14 through testimony. Like you pretty much
 15 need both parties on hand to design a rate
 16 and in the past, I've worked with the
 17 Newfoundland Power rate design experts and
 18 we've actually come up with rate designs
 19 that I think were much improved over what
 20 they would have been in the absence of that
 21 cooperation. I remember working with one
 22 particularly right individual back in the
 23 day.
 24 MR. O'BRIEN:
 25 Q. I wondered where you went with that.

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1 MR. BOWMAN:
 2 A. I'm not sure whatever happened to that guy.
 3 CHAIR:
 4 Q. Yeah, we'll move on.
 5 MR. BOWMAN:
 6 A. Now, also in Nova Scotia, the regulator
 7 there directed that the utility work with me
 8 to design rates, and that again worked out
 9 quite well. And that's why I'm recommending
 10 that the Board direct Newfoundland Power and
 11 the Consumer Advocate to get together and do
 12 something on existing rates. I'm not
 13 talking about changing existing rate
 14 designs. I'm talking about modifying the
 15 charges in those rate designs to better
 16 reflect marginal costs.
 17 Now, just to comment on that further,
 18 now CA Energy Consultants, they provided
 19 their report on April 1st, 2024 and that was
 20 – that came after Newfoundland Power
 21 submitted their application, but just a
 22 couple of quotes from there. They say that
 23 “Newfoundland Power seems well positioned
 24 with its current rate designs for the
 25 general service classes that are structured

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1 to provide marginal cost-based price
 2 signals.” In fact, they recommend that
 3 “Newfoundland Power leave current rate
 4 designs in place and adjust customer demand
 5 and energy charges to collect the revenue
 6 requirement and more adequately reflect
 7 changes in Hydro’s marginal cost”, and
 8 that’s an important distinction. It’s not
 9 Newfoundland Power’s marginal cost we’re
 10 reflecting. It’s Hydro’s. So, it doesn’t
 11 matter whether you make changes to the
 12 wholesale rate or not. You should still
 13 make changes to the retail rates to reflect
 14 marginal cost.
 15 Now, they also indicate that
 16 Newfoundland Power might consider
 17 adjustments to the general service demand
 18 charges to send customers stronger and more
 19 cost-based price signals about winter
 20 marginal capacity costs. So, you look at it
 21 and you’d only have to look at the energy
 22 charges. You could also look at the demand
 23 charges in the general service class. Okay.
 24 Now, that’s consistent with my
 25 recommendation.

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1 MR. O'BRIEN:
 2 Q. Mr. Chair, I wonder, that document's not on
 3 the record. Is there an intention to put
 4 that document on the record somehow?
 5 FITZGERALD, KC:
 6 Q. Which document?
 7 MR. O'BRIEN:
 8 Q. The CA Energy report.
 9 CHAIR:
 10 Q. I actually thought that might be on the
 11 record.
 12 MR. O'BRIEN:
 13 Q. It was put through as a possible cross-
 14 examination aide but it was never entered on
 15 the record.
 16 CHAIR:
 17 Q. I'll pass that over to Ms. Glynn.
 18 MR. O'BRIEN:
 19 Q. And it wasn't used.
 20 MS. GLYNN:
 21 Q. If the witness would like to introduce it
 22 and adopt it, we can ask if there's an
 23 objection to that being placed on the record
 24 now.
 25 MR. O'BRIEN:

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1 Q. We haven't prepped anything for it, in terms
 2 of questions for this witness.
 3 MS. GLYNN:
 4 Q. No.
 5 MR. O'BRIEN:
 6 Q. So, I don't know how, to be honest, how
 7 fulsome that review that Mr. Bowman has
 8 given on that document is at this stage.
 9 FITZGERALD, KC:
 10 Q. The anomaly of this -
 11 MR. O'BRIEN:
 12 Q. And it's not in his evidence.
 13 FITZGERALD, KC:
 14 Q. No, but it's actually - it's a Newfoundland
 15 Power document.
 16 MR. O'BRIEN:
 17 Q. Understandable, but it's not in this
 18 witness's evidence.
 19 FITZGERALD, KC:
 20 Q. I'm not sure I understand the objection.
 21 There's no surprise here. It's a document
 22 that Newfoundland Power has presented. All
 23 parties have reviewed it, including Mr.
 24 Bowman. To isolate it or keep it insulated
 25 from Mr. Bowman's comments now doesn't make

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1 a lot of sense to me.
 2 MR. O'BRIEN:
 3 Q. I'm not intending to keep it insulated or
 4 isolated. I'm trying to make sure that
 5 we're following proper procedural rules here
 6 in terms of this witness. If the witness is
 7 going to speak to the witness's evidence
 8 that the witness do so. If the witness is
 9 going to speak to somebody else's evidence,
 10 it should be on the record.
 11 (9:45 a.m.)
 12 CHAIR:
 13 Q. I have to agree it does create a
 14 disadvantage somewhat for counsel of
 15 Newfoundland Power to ask questions on a
 16 document that's not on the record, if they
 17 haven't been expecting it to be presented
 18 for discussion.
 19 MR. O'BRIEN:
 20 Q. I'll be honest, I'm not going to ask any
 21 questions on it. So, I just need to raise
 22 it at this point because it's not in this
 23 witness's evidence.
 24 CHAIR:
 25 Q. Mr. Bowman, I think you can speak to the

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1 review of Christianson from a high level,
 2 what's been conducted and stuff, without
 3 necessarily getting into taking all the
 4 specific recommendations because I think a
 5 lot of the things you're talking about are
 6 generally consistent anyway. That's fair.
 7 Would that be okay?
 8 MR. BOWMAN:
 9 A. Okay. Last point I'll make on that is that
 10 they - and they say -- and this is common
 11 knowledge in the industry and that's
 12 "efficient prices provide market signals
 13 about the present and future cost of
 14 providing energy service which encourages
 15 customers to use electricity economically
 16 and utilities to build the minimum system
 17 necessary to meet the demands of customers."
 18 That means it's least cost. Okay.
 19 Now, and my last recommendation
 20 regarding existing rates is existing rate
 21 options. I recommend that they be updated
 22 to reflect marginal cost. Again, I'm
 23 maintaining existing rate designs but update
 24 the charges of the various rate components
 25 to reflect marginal cost, and you don't need

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1 a rate design consultant to tell you that
 2 buyback rate for net metering customers
 3 should reflect marginal cost rather than the
 4 18 cents per kilowatt hour currently -
 5 that's employed currently. As Newfoundland
 6 Power's information indicates that 18 cent
 7 per kilowatt hour marginal cost is no longer
 8 relevant in this jurisdiction. Okay.
 9 Now, advanced metering infrastructure
 10 or smart meters. I'll refer to them as
 11 smart meters so everybody doesn't get mixed
 12 up with the AMI versus the AMR. Now, my
 13 recommendation on smart meters is that
 14 Newfoundland Power conduct a study on the
 15 cost and benefits of AMI by year end. Now,
 16 there's numerous templates around upon which
 17 to base a study. I note that Mr. Chubbs
 18 said that New Brunswick Power and Nova
 19 Scotia Power, they kept stacking up layers
 20 of benefits until the benefits exceeded the
 21 cost. Well, this is what - I recommend that
 22 Newfoundland Power do the same. That's the
 23 way you do a cost benefit analysis. You
 24 look at all the costs, all the benefits,
 25 quantify all those benefits.

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1 Now, the reason I recommend this is
 2 because 94 percent of Canadian households
 3 and businesses are expected to have smart
 4 meters in the next two years. That doesn't
 5 mean – that's not everyone, but it's all but
 6 six percent, and of course, the utilities
 7 out here, New Brunswick, Nova Scotia,
 8 they're already well on their way. New
 9 Brunswick's been looking at this for six
 10 years. In my opinion, the Board needs to
 11 know why Newfoundland Power isn't doing
 12 this.

13 Now, and I know Mr. Chubbs indicated
 14 that Newfoundland Power has studied smart
 15 meters a number of times, but I haven't seen
 16 that study. I haven't seen that study or
 17 any of the studies. Mr. Comerford was asked
 18 yesterday if he was aware of the
 19 Newfoundland Power study on smart meters and
 20 he seemed to indicate that he wasn't aware
 21 of one but did indicate that this is Mr.
 22 Chubbs' department. Now, I'm a little
 23 surprised that someone in the rates
 24 department – I would expect them to have an
 25 interest in smart meters because it does

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1 accommodate Time-of-Use Rates, but in any
 2 regard, we haven't seen that study.

3 Now, as I said, there's – like when we
 4 asked – we talked to Newfoundland Power
 5 about this and they gave us a potential
 6 study, scope of work for a potential study,
 7 and that potential study does not look at
 8 smart meters. It looks at load shifting
 9 only. Load shifting is one of I think nine
 10 benefits of smart meters that Newfoundland
 11 Power identified. Now my own energy
 12 supplier, electricity supplier, is
 13 Shenandoah Valley Electric Co-op. They're a
 14 very small utility. They're embarking on a
 15 smart metering program and they indicate
 16 that they have no intention of implementing
 17 Time-of-Use rates or load control rates.
 18 They're just on the basis of those other
 19 eight benefits that Newfoundland Power has
 20 identified.

21 I also note that installing smart
 22 meters would provide essential information
 23 on customer consumption characteristics,
 24 possibly negating the need to install
 25 special metering for future load research

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1 studies. It would avoid those embarrassing
 2 supply chain issues now being experienced
 3 and if you think that smart meters are not
 4 the metering system of choice going forward
 5 then what you need to do is identify the
 6 utilities that are currently embarking on an
 7 AMR metering program that's like that
 8 currently in place in Newfoundland.

9 Now, as I stated in my response to PUB-
 10 CA-026(ii), Narragansett Electric Company of
 11 Rhode Island indicates that its smart meter
 12 program has a revenue to cost ratio of 3.9,
 13 and I'm wondering how many of Newfoundland
 14 Power's programs have cost benefit ratios --
 15 revenue to cost ratios that exceed that.

16 Now, the cost of the program is expected to
 17 result in a bill increase over the first
 18 five years of \$2.46 total. That equates to
 19 about 5.6 cents Canadian per month over the
 20 first five years of the program. After
 21 that, bills would decrease. So again, I
 22 recommend the Board order that a study on
 23 smart meters be done on the potential
 24 benefits because they're just too good to
 25 ignore.

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1 Now, distribution planning. As I
 2 indicated earlier, I modified the Republic
 3 of Georgia's distribution code about seven
 4 or eight years ago. Now, the distribution
 5 code covered, in one document, planning
 6 operations, metering and connections. You
 7 can think how much easier would it be for
 8 the Board and the Intervenor to understand
 9 what Newfoundland Power is doing if each of
 10 those areas were included in a single
 11 document. That would include – that would
 12 improve transparency considerably. Now
 13 Newfoundland Power has said that it meets
 14 the criteria for a planning guide that I set
 15 out in my evidence, but the key component of
 16 the planning guide is the development of a
 17 five-year distribution expansion plan.

18 As noted, I reviewed Georgia's planning
 19 document seven or eight years ago, but
 20 Georgia's been developing five-year
 21 distribution expansion plans. They were
 22 doing that long before I was there.

23 Now, Ms. Greene yesterday noted that
 24 the Government's Electrification Initiative
 25 is expected to result in increased load,

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1 perhaps significantly, and asked Mr. Chubbs
 2 what NP was doing to meet the challenge.
 3 Mr. Chubbs cited a few things, but on the
 4 other hand, if Newfoundland Power had a
 5 five-year expansion plan, Ms. Greene
 6 wouldn't have had to ask the question. She
 7 would have seen it right in that expansion
 8 plan.
 9 And further, I'm not too clear on just
 10 what happened at the Long Pond substation.
 11 Like Newfoundland Power built the substation
 12 at a cost of 4.7 million in 2021 and charged
 13 the full amount to the university. Now,
 14 then a couple years later, they came in with
 15 another application seeking another 3.3
 16 million for the substation upgrade at Long
 17 Pond. Now, the original 4.7 million cost
 18 was paid by the university because the new
 19 substation was considered a duplicate
 20 supply. What that meant was all the load
 21 could have been supplied by the MUN
 22 substation. So, the LPD substation was
 23 superfluous, okay. It just gave them a
 24 second supply which is important, since they
 25 have hospital facilities there. But then

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1 the substation upgrade came around because
 2 of an increase in load presumably brought on
 3 by the electrification of the boilers.
 4 So, that leads to two questions. First
 5 is does this mean that the 4.7 million spent
 6 on the LPD substation, developing that
 7 substation, is not a duplicate supply? Does
 8 it mean it's part of the main supply now and
 9 does that mean Newfoundland Power should be
 10 refunding the 4.7 million back to the
 11 university? The second thing, NP has --
 12 Newfoundland Power has known about the
 13 electrification of these boilers for some
 14 time and I'm wondering if they'd had a five-
 15 year distribution expansion plan, maybe that
 16 additional 3.3 million dollars for the
 17 upgrade could have been avoided.
 18 The last topic is reliability. Mr.
 19 Chubbs indicates that he feels targeting the
 20 level of reliability that is 40 percent
 21 better than Canadian average is least cost.
 22 I'm sure the rest of the industry would be
 23 grateful to know this because I'm not aware
 24 of anyone else who plans their system be 40
 25 percent better than an average. Now, and I

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1 think, I have to believe the Board would not
 2 feel particularly comfortable at approving a
 3 reliability target that's 40 percent better
 4 than Canadian average on the basis of an
 5 individual's feelings. I'd want to see some
 6 evidence on that. Now, if I were the Board,
 7 I would ask Newfoundland Power to quantify
 8 the cost incurred on behalf of its customers
 9 to improve reliability at levels that are 40
 10 percent better than Canadian average. That
 11 will help the Board decide if reliabilities
 12 that are zero percent, 20 percent, 40
 13 percent or 80 percent better than the
 14 Canadian average are least cost.
 15 And then I'd just note, like I said in
 16 my evidence, with the advent of electric
 17 vehicles with their significant battery
 18 storage, that will revolutionize reliability
 19 in the future. Everybody's going to have a
 20 power supply sitting in their driveway. So,
 21 if you lose power, you will still be able to
 22 plug into that and run a few appliances.
 23 Now, another note on reliability. I
 24 recommend establishing target reliability at
 25 the Canadian average. Newfoundland Power

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1 suggests that that would be require them to
 2 do some pretty foolish things, like for
 3 example, slowing its response time following
 4 storms. I don't recommend that Newfoundland
 5 Power do something foolish. I expect them
 6 to do something smart, like the good utility
 7 managers that they are.
 8 Now further, since Newfoundland Power
 9 believes there's no incremental cost
 10 associated with maintaining current levels
 11 of reliability, I recommend that the Board
 12 reduce NP's operating budget and its capital
 13 programs relating to automation. Given that
 14 there's no incremental cost, reducing the
 15 budgets for these programs would have no
 16 detrimental impact on reliability.
 17 And that concludes my direct evidence.
 18 CHAIR:
 19 Q. So, Mr. O'Brien.
 20 MR. DOUGLAS BOWMAN, CROSS-EXAMINATION BY MR. LIAM
 21 O'BRIEN
 22 MR. O'BRIEN:
 23 Q. Okay. Thank you, Mr. Bowman. I'm going to
 24 try not to keep you there too long. Just a
 25 few of your recommendations I just want to

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1 have a chat about, and there's been rebuttal
 2 evidence filed already addressing all of
 3 them, I think, so I'm not going to take you
 4 through them all. The first one I just
 5 wanted to touch on, I think you've largely
 6 touched on the wholesale rate. I'm not
 7 going to touch too much on that. The load
 8 forecast or load research study, I guess
 9 your comments there are observational
 10 comments that it's a priority that you think
 11 that Newfoundland Power should have that
 12 study completed as soon as possible. Is
 13 that fair?
 14 MR. BOWMAN:
 15 A. Yes.
 16 MR. O'BRIEN:
 17 Q. Yeah. And if Newfoundland Power's evidence
 18 is they're doing so, that meets your concern
 19 for that recommendation, does it?
 20 MR. BOWMAN:
 21 A. Yes.
 22 MR. O'BRIEN:
 23 Q. Okay. And I mean, that information is going
 24 to be helpful going forward. I mean, end
 25 use activities are likely changed since

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1 2003, I would imagine, on the grid. That's
 2 a fair comment?
 3 MR. BOWMAN:
 4 A. That's a fair comment and that's why we're
 5 doing the study.
 6 MR. O'BRIEN:
 7 Q. Yeah. That's why we're doing studies, okay.
 8 I'm not going to ask too much about the –
 9 and I'll call it the MUN issue, but I think
 10 the connection issues and the concerns that
 11 you've raised. You've given us a fair
 12 overview of what your concerns are with
 13 respect to that area. Your third
 14 recommendation to exclude the cost of radial
 15 connection facilities that benefit only one
 16 customer from Newfoundland Power's rate base
 17 and allocate them to the entire cost to the
 18 benefiting customer, that essentially is the
 19 MUN issue to you, isn't it? That's where it
 20 arises out of?
 21 MR. BOWMAN:
 22 A. That's where (unintelligible) yes, yeah.
 23 MR. O'BRIEN:
 24 Q. I mean, the recent application, the
 25 supplemental application in 2023 for the MUN

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1 substation and the capital budget
 2 application that included Long Pond, that's
 3 really where that issue arose. Is that
 4 fair?
 5 MR. BOWMAN:
 6 A. When I first started looking at the Cost of
 7 Service Study was when the MUN T-2
 8 transformer replacement project came up.
 9 MR. O'BRIEN:
 10 Q. So, you were involved in that supplemental –
 11 you were consulted on the 2023 supplemental
 12 application to do some capital budget
 13 modifications to the MUN substation?
 14 MR. BOWMAN:
 15 A. I was.
 16 MR. O'BRIEN:
 17 Q. You were consulted. And you would have
 18 reviewed the record on that occasion?
 19 MR. BOWMAN:
 20 A. Yes.
 21 MR. O'BRIEN:
 22 Q. And reached an opinion?
 23 MR. BOWMAN:
 24 A. Yes.
 25 MR. O'BRIEN:

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1 Q. Okay. And that opinion is essentially the
 2 same as the opinion you've given here today?
 3 MR. BOWMAN:
 4 A. That's right.
 5 MR. O'BRIEN:
 6 Q. Yeah. And you've reviewed the record here
 7 in this matter?
 8 MR. BOWMAN:
 9 A. In this General Rate Application?
 10 MR. O'BRIEN:
 11 Q. Yes.
 12 MR. BOWMAN:
 13 A. Yes.
 14 MR. O'BRIEN:
 15 Q. As it pertains to that issue?
 16 MR. BOWMAN:
 17 A. Yes.
 18 MR. O'BRIEN:
 19 Q. And you did the same thing for the '24
 20 Capital Budget Application. You've noted
 21 that in your evidence. So, all of that
 22 record, you reviewed and there's no real
 23 change in the evidence that's in this GRA
 24 than what was put before the Board in the
 25 2023 Supplemental Capital Budget Application

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1 and the 2024 Capital Budget Application?
 2 That's fair?
 3 MR. BOWMAN:
 4 A. That's true.
 5 MR. O'BRIEN:
 6 Q. Okay. So, your concern now is that the
 7 Board got it wrong in those two orders?
 8 MR. BOWMAN:
 9 A. That's correct.
 10 MR. O'BRIEN:
 11 Q. Okay. But there's no evidence to say to the
 12 Board, "here is something new that you ought
 13 to have considered to modify your order"?
 14 Is that fair?
 15 MR. BOWMAN:
 16 A. Well, I've submitted evidence on that that I
 17 think wasn't on the record previously.
 18 MR. O'BRIEN:
 19 Q. And what is that evidence that wasn't on the
 20 record previously? Like it's documentation
 21 you saw before. You understood it to be
 22 there on those other applications. So, what
 23 is new this time?
 24 (10:00 a.m.)
 25 MR. BOWMAN:

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1 A. I think what's new is the Long Pond
 2 substation issue, the 3.3 million dollar
 3 expansion of that transformer station and
 4 then just the construction of the substation
 5 itself.
 6 MR. O'BRIEN:
 7 Q. But that was ruled on by the Board.
 8 MR. BOWMAN:
 9 A. Yes, it was ruled on by the Board.
 10 MR. O'BRIEN:
 11 Q. Okay. So, it's not new in this application.
 12 It was ruled on.
 13 MR. BOWMAN:
 14 A. It's not new in this application, no.
 15 MR. O'BRIEN:
 16 Q. It's not new to the Board?
 17 MR. BOWMAN:
 18 A. It's new in my evidence.
 19 MR. O'BRIEN:
 20 Q. It's not new to the Board though?
 21 MR. BOWMAN:
 22 A. No, no.
 23 MR. O'BRIEN:
 24 Q. Were you consulted on that Long Pond
 25 application?

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1 MR. BOWMAN:
 2 A. No.
 3 MR. O'BRIEN:
 4 Q. You weren't at all, okay. So, it's new to
 5 you now and your issue is that that causes
 6 some confusion to you about whether there
 7 should be a refund on the prior order?
 8 MR. BOWMAN:
 9 A. Well, I'm wondering about that. I'm not
 10 recommending that it be done. I'm wondering
 11 if there should be.
 12 MR. O'BRIEN:
 13 Q. All right. So, in terms of your next – so,
 14 you're basically recommending that the Board
 15 overturn its previous orders?
 16 MR. BOWMAN:
 17 A. Yes.
 18 MR. O'BRIEN:
 19 Q. Okay. In terms of the transparent – so, the
 20 next recommendation you said Newfoundland
 21 Power should develop a transparent policy
 22 relating to connections.
 23 MR. BOWMAN:
 24 A. Yes.
 25 MR. O'BRIEN:

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1 Q. And make amendments to the schedule of
 2 rates. So, that arises essentially out of
 3 the same issue, doesn't it?
 4 MR. BOWMAN:
 5 A. That's right.
 6 MR. O'BRIEN:
 7 Q. Okay. So, rather than overturn the Board's
 8 rulings, what the Board could do is order
 9 Newfoundland Power to change its policies so
 10 it meets with your opinion?
 11 MR. BOWMAN:
 12 A. Yes.
 13 MR. O'BRIEN:
 14 Q. Okay. So, in through the backdoor what you
 15 don't get through the front door?
 16 MR. BOWMAN:
 17 A. I'm not sure what that means.
 18 MR. O'BRIEN:
 19 Q. Well, what that means is if you can't get
 20 the Board to overturn its ruling or
 21 reconsider its ruling, you're suggesting the
 22 Board to then order Newfoundland Power to
 23 modify its policies so then they would meet
 24 with your opinion that the Board should
 25 change its ruling.

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1 MR. BOWMAN:
 2 A. No, I think the Board should do both. The
 3 Board has set – when the Board issues a
 4 decision, it sets regulatory precedent.
 5 MR. O'BRIEN:
 6 Q. Right.
 7 MR. BOWMAN:
 8 A. And I think it should issue another decision
 9 that overturns those two previous orders to
 10 eliminate that bad regulatory precedent.
 11 MR. O'BRIEN:
 12 Q. But in terms of changing policies, if that's
 13 not done, if you change the policy going
 14 forward, then you won't have that regulatory
 15 precedent.
 16 MR. BOWMAN:
 17 A. You'll have to repeat that.
 18 MR. O'BRIEN:
 19 Q. Okay. So, like right now, the Board has
 20 made its rulings -
 21 MR. BOWMAN:
 22 A. Yes.
 23 MR. O'BRIEN:
 24 Q. - based on policies that are in existence
 25 and evidence that was before it. If you ask

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1 the Board to order Newfoundland Power to
 2 change its policies, well then, that
 3 precedent doesn't really matter anymore
 4 because the policies have been ordered to
 5 change, so now they meet with your opinion?
 6 MR. BOWMAN:
 7 A. No, I wouldn't say that. Those decisions
 8 are still on the record.
 9 MR. O'BRIEN:
 10 Q. But if the policies are different, how is it
 11 precedential?
 12 MR. BOWMAN:
 13 A. Well, it sets precedent when you make it.
 14 MR. O'BRIEN:
 15 Q. Yeah.
 16 MR. BOWMAN:
 17 A. When you issue an order.
 18 MR. O'BRIEN:
 19 Q. I think we're in agreement on that. But if
 20 you change – if the Board orders the
 21 policies to be changed then, then they're
 22 not comparing apples to apples anymore
 23 because the policies have been ordered to
 24 change. So, now you can have a position
 25 then where you can argue before the Board

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1 that this is not the same thing as it was
 2 last time because the policies are changed.
 3 MR. BOWMAN:
 4 A. Well, the next time you would argue
 5 something different, but I would still like
 6 to see a rescindance (sic.) of that order,
 7 those orders.
 8 MR. O'BRIEN:
 9 Q. Okay. And there was an application for a
 10 reconsideration on one of those orders that
 11 was denied, correct? Are you aware of that?
 12 MR. BOWMAN:
 13 A. I'm not sure what that was called, but there
 14 was a request for reconsideration I think,
 15 something along those lines.
 16 MR. O'BRIEN:
 17 Q. Okay. So, in terms of the general service
 18 rate class, you've sort of suggested that we
 19 should carve out some of these. I think
 20 there's the two mines should be carved out
 21 and there's another – I guess MUN should be
 22 carved out as a separate?
 23 MR. BOWMAN:
 24 A. A separate rate class.
 25 MR. O'BRIEN:

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1 Q. Okay. So, you're aware there's a rate
 2 design review ongoing now and Newfoundland
 3 Power has indicated it's going to look at
 4 Memorial in the context of that, and if it
 5 looks at those other general members of the
 6 rate class in the context of that review, is
 7 that – and gets more comprehensive
 8 information, would that be sufficient to
 9 meet your recommendation?
 10 MR. BOWMAN:
 11 A. It would be in the future, but it wouldn't
 12 be now.
 13 MR. O'BRIEN:
 14 Q. Okay.
 15 MR. BOWMAN:
 16 A. Those mines are paying way too much now.
 17 That's not fair.
 18 MR. O'BRIEN:
 19 Q. How do you know that?
 20 MR. BOWMAN:
 21 A. Because they're being charged for
 22 distribution costs and being charged double
 23 for connection costs.
 24 MR. O'BRIEN:
 25 Q. Okay.

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1 MR. BOWMAN:
 2 A. So, the rate's higher than it should be. I
 3 don't know how much higher.
 4 MR. O'BRIEN:
 5 Q. But have you compared that to what MUN's
 6 paying?
 7 MR. BOWMAN:
 8 A. I don't need to compare it to what MUN's
 9 paying.
 10 MR. O'BRIEN:
 11 Q. Well, do you know whether MUN owns all of
 12 its distribution facilities and is paying
 13 for those?
 14 MR. BOWMAN:
 15 A. Its own distribution facilities?
 16 MR. O'BRIEN:
 17 Q. Yeah.
 18 MR. BOWMAN:
 19 A. Well, define distribution facility, because
 20 I think Newfoundland Power and I have a
 21 different definition of that.
 22 MR. O'BRIEN:
 23 Q. Okay. So, there may be, in a comprehensive
 24 review, more information to look at to
 25 determine whether you should carve off,

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1 whether you should modify the cost of
 2 service study. Is that fair?
 3 MR. BOWMAN:
 4 A. Well, you may have more information, but you
 5 don't need to wait for that to do that now.
 6 MR. O'BRIEN:
 7 Q. Can just do it right now?
 8 MR. BOWMAN:
 9 A. You can do it right now.
 10 MR. O'BRIEN:
 11 Q. Okay. And Newfoundland Power has chosen
 12 that what they will say is a pragmatic
 13 approach to look at a comprehensive rate
 14 review study before doing that. Is that
 15 unreasonable?
 16 MR. BOWMAN:
 17 A. Well, first of all, they indicated that that
 18 wasn't part of the rate design review. Now,
 19 in evidence in cross-examination, they've
 20 indicated they would include that as part,
 21 but I don't think you need a rate design
 22 expert to tell you to change your cost of
 23 service study. I don't think they consulted
 24 a rate design expert to change the cost of
 25 service study for this application.

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1 MR. O'BRIEN:
 2 Q. I guess my question more is on the lines of
 3 is it unreasonable to consider that.
 4 MR. BOWMAN:
 5 A. It's not unreasonable to consider that, but
 6 it's unreasonable to let this linger.
 7 MR. O'BRIEN:
 8 Q. And it's your opinion that it should be –
 9 should happen as soon as possible?
 10 MR. BOWMAN:
 11 A. Yes.
 12 MR. O'BRIEN:
 13 Q. Yeah, okay. And the street area lighting,
 14 and I understood your position isn't sort of
 15 strong on that, but I've read through your
 16 evidence and I did want to ask you just in
 17 terms of other classes. You didn't mention,
 18 for example, the domestic customers having
 19 been at 96 percent versus the street area
 20 lighting at 97 percent. You didn't mention
 21 that there should be any modifications to
 22 that.
 23 MR. BOWMAN:
 24 A. No, I accept that – I accept Newfoundland
 25 Power's position that having revenue to cost

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1 ratios between 90 and 100 percent is
 2 reasonable.
 3 MR. O'BRIEN:
 4 Q. Yeah, okay, and that's what I figured. And
 5 that, I mean, ultimately, I mean, you've
 6 been doing this for a long time and you
 7 can't be perfect to costs at 100 percent for
 8 everybody. That's fair?
 9 MR. BOWMAN:
 10 A. That's fair, yeah.
 11 MR. O'BRIEN:
 12 Q. Okay. And there's going to be knock-on
 13 effects of some sort when you start moving
 14 around the dial for one class over another.
 15 MR. BOWMAN:
 16 A. Well, you could – in the case of the street
 17 lighting, if you increase the rate by three
 18 percent, for example, whatever brings it up
 19 to the 100 percent, you could likewise
 20 reduce one of the other customers that are
 21 up closer to 110 percent, reduce their rate
 22 to kind of make things a little more fair.
 23 MR. O'BRIEN:
 24 Q. And if you did the same thing with domestic
 25 customers and moved them up to 100 percent,

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1 you could – I’m not suggesting you do that.
 2 I’m just saying that anyone of those things
 3 would have a knock-on effect because you’re
 4 dealing with the same revenue requirement.
 5 MR. BOWMAN:
 6 A. Yeah, you got to collect the revenue
 7 requirement.
 8 MR. O'BRIEN:
 9 Q. Yeah, yeah. In terms of the retail rate
 10 design, and I appreciate your evidence here
 11 this morning just in terms of a follow
 12 through on Mr. Comerford’s comments in terms
 13 of modifying the design itself. I think
 14 your opinion is you don’t necessarily have
 15 to modify the design. You can modify some
 16 of the pieces that are in the existing
 17 design. Is that your evidence?
 18 MR. BOWMAN:
 19 A. That’s correct.
 20 MR. O'BRIEN:
 21 Q. Okay. And would it be more useful to have
 22 more comprehensive information and data from
 23 the rate design review before you did that?
 24 Like would it be more useful to have input
 25 from customers, to have a full review on

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1 what the potential impacts of any of those
 2 modifications would be before you did that?
 3 MR. BOWMAN:
 4 A. It wouldn’t be – like that’s why I say we
 5 should sit down together and come up with
 6 this rate. So, Newfoundland Power would be
 7 able to tell me immediately what the rate
 8 impacts were on the different customer
 9 classes for different charges. But you
 10 don’t need to – like well CA Energy
 11 Consultants, and I know that hasn’t been
 12 apparently put on the record, but they’ve
 13 made it quite clear that you can do quite a
 14 bit with the existing rate designs.
 15 MR. O'BRIEN:
 16 Q. So, you could do that, but if Newfoundland
 17 Power wants to take a pragmatic approach and
 18 have more comprehensive information, is that
 19 unreasonable?
 20 MR. BOWMAN:
 21 A. It’s unnecessary.
 22 MR. O'BRIEN:
 23 Q. But is it unreasonable? I know your
 24 position is that you can do it.
 25 MR. BOWMAN:

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1 A. Yes.
 2 MR. O'BRIEN:
 3 Q. But is it unreasonable for them to want to
 4 have that more comprehensive information?
 5 MR. BOWMAN:
 6 A. I think it represents a lost opportunity.
 7 MR. O'BRIEN:
 8 Q. Okay. But you won’t say it’s unreasonable?
 9 MR. BOWMAN:
 10 A. I won’t say it’s unreasonable.
 11 MR. O'BRIEN:
 12 Q. And that’s fine. I mean, I don’t want to
 13 put words in your mouth.
 14 MR. BOWMAN:
 15 A. You’re doing your best.
 16 MR. O'BRIEN:
 17 Q. I got to say, you did a pretty good job of
 18 covering off most of the concerns that I was
 19 going to cover with you. The only last area
 20 I think I would want to touch on is the AMI
 21 meters and I don’t want to touch on that too
 22 much, but I gather from your evidence, and
 23 we’ve read through it and Mr. Chubbs has
 24 commented on it. There’s evidence in the
 25 rebuttal on it. I just want to ask just

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1 whether you could confirm – and if you don’t
 2 know the answer to this, that’s fine. Mr.
 3 Chubbs had indicated that AMR meters, for
 4 example, have like a lifespan of about 18
 5 years. Does that sound to be something in
 6 your – is that something in your experience
 7 you could comment on?
 8 MR. BOWMAN:
 9 A. That sounds reasonable, yeah.
 10 MR. O'BRIEN:
 11 Q. Yeah, okay. And certainly you wouldn’t be
 12 taking the position that it would be
 13 appropriate to go out and replace these
 14 meters while they still have a lifespan.
 15 You don’t want stranded assets and to spend
 16 capital on replacing stranded assets or
 17 assets that would be stranded? That’s fair?
 18 MR. BOWMAN:
 19 A. No.
 20 MR. O'BRIEN:
 21 Q. Oh, okay.
 22 MR. BOWMAN:
 23 A. And I think these assets might become
 24 stranded.
 25 MR. O'BRIEN:

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1 Q. Okay, all right, and that's what I wanted –
 2 I want you to expand on that.
 3 MR. BOWMAN:
 4 A. Yeah.
 5 MR. O'BRIEN:
 6 Q. What process do you think should be
 7 followed?
 8 MR. BOWMAN:
 9 A. Well, the process you should follow is do an
 10 actual study of smart meters. Do a study on
 11 the smart meters and then we'll go from
 12 there. Like I just don't see how you can
 13 avoid looking at all these benefits for
 14 customers and just toss it off like it
 15 should be ignored, not when everybody else
 16 seems to be doing it. Like do a study and
 17 prove to the Board that it's not the
 18 appropriate time to do it.
 19 MR. O'BRIEN:
 20 Q. Did it seem to you – and you sat through Mr.
 21 Chubbs' evidence on this, I think.
 22 MR. BOWMAN:
 23 A. I did.
 24 MR. O'BRIEN:
 25 Q. Did it seem to you that Mr. Chubbs was

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1 tossing this off and ignoring it?
 2 MR. BOWMAN:
 3 A. Well, they haven't done a study on it.
 4 MR. O'BRIEN:
 5 Q. That wasn't my question. Did it seem to you
 6 that he had the opinion that this wasn't
 7 worth looking at or did it seem to you that
 8 he had the opinion that "we want to make
 9 sure we do it when its least cost for
 10 customers"?
 11 MR. BOWMAN:
 12 A. Well, my understanding was he thinks it's
 13 not worth doing right now.
 14 MR. O'BRIEN:
 15 Q. That wasn't the question either. Did it
 16 seem to be that he was ignoring this issue?
 17 MR. BOWMAN:
 18 A. He was certainly putting it off into the
 19 future. I wouldn't say he was ignoring it,
 20 but he was delaying it, you know, delaying
 21 it like many other things that are being
 22 delayed.
 23 MR. O'BRIEN:
 24 Q. What do you mean by that?
 25 MR. BOWMAN:

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1 A. Well, the load research study, the asset
 2 management plan, the rate design review.
 3 Like there's a lot of things that are in the
 4 future rather than now.
 5 MR. O'BRIEN:
 6 Q. So, your opinion is Newfoundland Power is
 7 delaying all this stuff intentionally?
 8 MR. BOWMAN:
 9 A. I think it's taking them longer to do it
 10 than it should be.
 11 MR. O'BRIEN:
 12 Q. Now, is that an expert opinion or an
 13 observation?
 14 MR. BOWMAN:
 15 A. Well, the rate design study that was done by
 16 CA Energy Consultants, I could have done
 17 that in a month and I see they have three
 18 authors. I mean that takes a little longer.
 19 It just strikes me that that's taking longer
 20 than it would take me to do.
 21 MR. O'BRIEN:
 22 Q. I guess my question is more is it your role,
 23 do you think, to admonish Newfoundland Power
 24 or is that the role of the Board?
 25 FITZGERALD, KC:

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1 Q. I'm wondering, Mr. Chair, that's kind of a
 2 leading question as to admonishment. I'm
 3 not sure if that's what – a yes or no.
 4 MR. O'BRIEN:
 5 Q. I think this is where this is going.
 6 FITZGERALD, KC:
 7 Q. Mr. Bowman's given his evidence. He said he
 8 believes that there's – from his observation
 9 that there's been a delay in some of the
 10 initiatives. Mr. Chubbs has given his
 11 evidence and it's pretty clear that there's
 12 nothing imminent and that's what Mr. Bowman
 13 has said this morning. That's what he
 14 observes.
 15 CHAIR:
 16 Q. Yeah, I mean, I think it's clear Mr.
 17 Bowman's expressing his frustration with the
 18 pace and there's nothing wrong with that.
 19 So, I don't see challenging the pace as much
 20 an admonishment as that.
 21 MR. O'BRIEN:
 22 Q. Well, I guess, Mr. Chair, my concern is that
 23 the witness should be an objective expert
 24 witness. It's up to the Board to decide if
 25 there's an issue to challenge on the pace,

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1 not for an expert witness.
 2 CHAIR:
 3 Q. Well, I think -
 4 MR. O'BRIEN:
 5 Q. And it goes to the credibility of the
 6 witness. I don't think that's the role.
 7 (10:15 a.m.)
 8 CHAIR:
 9 Q. Well, I think, Mr. O'Brien, it may depend on
 10 the experience of the witness, if he's been
 11 involved in previous studies in the past
 12 which may have taken – how long it would
 13 take. So, one could speak for an informed
 14 opinion based on past experience. But you
 15 know, so I think maybe it depend on one's
 16 past experience in judging, but I'll pass it
 17 over to our legal counsel.
 18 MR. O'BRIEN:
 19 Q. That's fine, Mr. Chair. I won't follow the
 20 line of questioning any further.
 21 MS. GLYNN:
 22 Q. I think the point has been made and I think
 23 we can -
 24 MR. O'BRIEN:
 25 Q. Yeah, I won't follow it any further. The

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1 last point I just wanted to ask you about,
 2 Mr. Bowman, was the reliability comments
 3 that you had made in terms of targeting the
 4 average and that sort of thing. I wonder
 5 whether or not you could comment and sort of
 6 expound on how it is you would expect
 7 Newfoundland Power to reduce its service to
 8 meet with your recommendation.
 9 MR. BOWMAN:
 10 A. I wouldn't recommend that they reduce their
 11 service. I would recommend that they target
 12 the average Canadian reliability levels.
 13 MR. O'BRIEN:
 14 Q. So, is this in terms of pulling that target
 15 in in executive comp target level or is it –
 16 how will they target their capital budget?
 17 Like what is it exactly that you are
 18 recommending?
 19 MR. BOWMAN:
 20 A. Well, when they say we're targeting a level
 21 that's 40 percent better than the Canadian
 22 average, I'm suggesting that they should
 23 target the Canadian average.
 24 MR. O'BRIEN:
 25 Q. Okay. So, if their 40 percent is the

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1 existing level of reliability, at some
 2 point, I guess I'm taking from your comments
 3 they have to target something lower than
 4 what they're providing at this stage. They
 5 must do changes to get to that. What I'm
 6 asking is what your recommended changes are.
 7 MR. BOWMAN:
 8 A. I don't think they have to make changes. I
 9 think they just have to stop spending money
 10 at maintaining the current level of
 11 reliability.
 12 MR. O'BRIEN:
 13 Q. So, let reliability reduce somehow?
 14 MR. BOWMAN:
 15 A. No, I don't think they have to let it
 16 reduce. I think they just have to target
 17 the Canadian average. You don't have to go
 18 out there and start doing foolish things,
 19 like I said.
 20 MR. O'BRIEN:
 21 Q. No, and I take your point on that, and I
 22 guess I'm following through with Mr. Chubb's
 23 comment that look, there's not really a
 24 reliability dial that we can say we're going
 25 to turn it down this notch from 40 percent

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1 to average and how is it that we're going to
 2 do it. If we're maintaining the reliability
 3 and it happens to be at 40 percent above
 4 average, the taking steps has to be in some
 5 area to get it down there, and I'm wondering
 6 do you have a comment on that, as to what
 7 steps to take or is this just a general
 8 comment that stop being so reliable?
 9 MR. BOWMAN:
 10 A. No. I would recommend that the Board dial
 11 it down by cutting their operating budget
 12 and perhaps their capital budget related to
 13 automation.
 14 MR. O'BRIEN:
 15 Q. Okay. So, that's where you're going?
 16 MR. BOWMAN:
 17 A. Yeah.
 18 MR. O'BRIEN:
 19 Q. Okay. I don't have any further questions
 20 for Mr. Bowman.
 21 CHAIR:
 22 Q. Mr. Simmons?
 23 SIMMONS, KC:
 24 Q. No questions. Thank you, Mr. Chairman.
 25 CHAIR:

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1 Q. Ms. Greene?
 2 GREENE, KC:
 3 Q. No questions, Mr. Chair.
 4 COMMISSIONER NEWMAN:
 5 Q. No questions.
 6 COMMISSIONER O'BRIEN:
 7 Q. No questions.
 8 MR. DOUGLAS BOWMAN, CROSS-EXAMINATION BY CHAIR KEVIN
 9 FAGAN
 10 CHAIR:
 11 Q. I've only got a couple things I wanted to
 12 touch on. On the MUN issue, I'm not
 13 touching with respect to MUN substation,
 14 just wanted cost of service and CIAC policy
 15 related. I just wanted to touch on the,
 16 call it, your evidence with respect to – and
 17 it's primarily about transmission
 18 allocation, when things are specifically –
 19 you can say specifically assigned versus
 20 common with regard to connection costs. Is
 21 that fair?
 22 MR. BOWMAN:
 23 A. Yes.
 24 CHAIR:
 25 Q. Okay. So, your concern is regard to an

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1 overallocation of transmission costs with
 2 respect to MUN, but in your evidence, you
 3 also touched on the allocation of
 4 distribution costs. So, MUN's paying for
 5 distribution costs through their customer
 6 rates as well, right?
 7 MR. BOWMAN:
 8 A. Yes.
 9 CHAIR:
 10 Q. Okay. So, and MUN is obviously the largest
 11 customer in the class. So, it's fair to say
 12 then, would you agree, that MUN's paying –
 13 in your view, MUN's paying inadequate
 14 transmission costs but probably too much
 15 distribution costs?
 16 MR. BOWMAN:
 17 A. Yes, yeah.
 18 CHAIR:
 19 Q. Okay. Now, because – so, there's
 20 uncertainty whether MUN's overpaying or
 21 underpaying right now because if they're so
 22 – such a large customer and they'd be
 23 picking up a large proportion of the
 24 distribution costs within the cost of
 25 service study and through rates as well. Is

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1 that fair?
 2 MR. BOWMAN:
 3 A. Yes.
 4 CHAIR:
 5 Q. Okay. So, we've got uncertainty on whether
 6 MUN's rates are over – are they being
 7 overcharged or undercharged?
 8 MR. BOWMAN:
 9 A. That's right.
 10 CHAIR:
 11 Q. Okay. So, with regard to the rate design
 12 review, do you think there should be a
 13 specific aspect of the rate design review
 14 that's just related to the overall
 15 assessment of the MUN rate?
 16 MR. BOWMAN:
 17 A. I don't think the rate design review has to
 18 do that. I think you can do that right now.
 19 CHAIR:
 20 Q. Okay. Second part was about the redundant
 21 supply. So, the redundant supply, assume –
 22 and I don't know all the details of it, but
 23 assume it was there because it was required
 24 for a hospital or something. I know
 25 hospitals across the island often have two

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1 feeds and stuff like that. There's
 2 standards required for feeding hospitals.
 3 So, there's – so, if the second supply was
 4 required to provide backup for the hospital
 5 and so, MUN paid the full cost for that
 6 supply. So, assume that's a scenario. So,
 7 they paid the full cost. So, you'd assume
 8 in future if there's further upgrades, I
 9 assume upgrades or replacement or sustaining
 10 capital required for that, that that would
 11 be funded by MUN as well in the future?
 12 Would that be your expectation?
 13 MR. BOWMAN:
 14 A. Yeah, I think if it relates to a connection
 15 facility that benefits only MUN, then they
 16 should pay for it.
 17 CHAIR:
 18 Q. Okay. So, not just on the initial
 19 investment, but for the future investments
 20 as well?
 21 MR. BOWMAN:
 22 A. Yes, that's right.
 23 CHAIR:
 24 Q. Okay.
 25 MR. BOWMAN:

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1 A. And that's the way NL Hydro does it with
 2 their specifically assigned assets.
 3 CHAIR:
 4 Q. Okay. And the additional load because of
 5 the boilers that came on, so that additional
 6 load then would provide additional revenues
 7 from MUN. The CIAC policy recovers – it's a
 8 distribution cost, distribution revenues are
 9 included in the – indeed the CIAC policy is
 10 on the record, so there's this load support
 11 in the CIAC policy which gives additional
 12 support to offset the revenues the customer
 13 will pay in future. So, if the customer is
 14 anticipated to pay to recover those costs,
 15 it would be through future billings, not
 16 through a payment upfront. Is that fair?
 17 MR. BOWMAN:
 18 A. That's the way it's set up to be, yes.
 19 CHAIR:
 20 Q. Yes, okay. So, the additional load then,
 21 MUN's – as long as MUN is continuing to pay
 22 rates that recover both distribution costs
 23 as well should recover those additional
 24 costs that are incurred for the additional
 25 transformer associated with the boilers.

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1 That's the concept, fair?
 2 MR. BOWMAN:
 3 A. That's the concept. Just to be clear, I'm
 4 not saying the CIAC policy should not relate
 5 to customer served from the distribution
 6 system. I'm saying like Hydro uses that,
 7 uses the same CIAC policy for their
 8 distribution customers, but Hydro hives off
 9 the Industrial Customers from that policy.
 10 Those policies don't apply to the customers
 11 served directly from the transmission
 12 system. I'm saying a similar policy should
 13 be in place for Newfoundland Power.
 14 CHAIR:
 15 Q. Under the current circumstances where MUN is
 16 paying rates which reflect both distribution
 17 costs and transmission costs, the revenue
 18 forecast from MUN would reflect the recovery
 19 of the distribution costs associated with
 20 that additional investment to provide that
 21 second transformer. That's the intention of
 22 the – would you agree that's the reason
 23 there would have been no charge to MUN for
 24 that additional three million – I believe
 25 three million dollar investment, something

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1 like that?
 2 MR. BOWMAN:
 3 A. Well, I agree that that was the
 4 justification for not charging MUN. I don't
 5 agree with its application.
 6 CHAIR:
 7 Q. Okay. And I believe within the policy
 8 that's on the record, there's a requirement
 9 to review the load that the customer gives
 10 Newfoundland Power to ensure that that load
 11 arrives and two year – so, my understanding,
 12 a two-year review. So, after two years, if
 13 that load doesn't show up, then Newfoundland
 14 Power could go back and charge the customer.
 15 So, it reduces the risk on other customers.
 16 So, you're familiar with that aspect of it?
 17 MR. BOWMAN:
 18 A. I understand that.
 19 CHAIR:
 20 Q. Okay. Well, that's all the questions I
 21 have. Thank you.
 22 MR. O'BRIEN:
 23 Q. I have nothing arising. Thank you.
 24 CHAIR:
 25 Q. Back over – oh, nothing. Going over to Ms.

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1 Glynn.
 2 MS. GLYNN:
 3 Q. I believe we are finished with -
 4 FITZGERALD, KC:
 5 Q. Nothing arising from us.
 6 MS. GLYNN:
 7 Q. So, I believe we are finished with our
 8 presentation of witnesses. As discussed, we
 9 will discuss written submission dates and I
 10 think we are done.
 11 CHAIR:
 12 Q. So, our agenda -
 13 MS. GLYNN:
 14 Q. Oh yes, sorry. Ms. Galarneau just reminded
 15 me that we should put a plug out for our
 16 Public Participation date, July 9th. We have
 17 yet to have anybody confirm, but we will be
 18 here July 9th, 9:00 for any member of the
 19 public that would like to come and speak to
 20 the Board.
 21 CHAIR:
 22 Q. And I'd like to thank everybody for your
 23 cooperation throughout the proceeding and
 24 respect and dignity as we proceeded through
 25 it. So, thanks everybody. Adjourned.

1 ADJOURNED AT 1:24 p.m.
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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;">A</p> <p>Able - 51:21, 70:7 Above - 14:15, 28:20, 28:22, 80:3 Absence - 37:20 Accept - 67:24 Access - 28:5 Accommodate - 4 6:1 Across - 83:25 Act - 33:11 Activities - 53:25 Actual - 36:18, 73:10 Add - 22:10, 31:6 Address - 1:8, 13:11 Addressing - 53:2 Adequately - 39:6 Adjourned - 88:25, 89:1 Adjust - 39:4 Adjustment - 14:1 2, 14:13 Adjustments - 39: 17 Administration - 1 9:7 Admonish - 75:23 Admonishment - 7 6:2, 76:20 Adopt - 4:4, 40:22 Advanced - 44:9 Advantage - 11:24, 33:15 Advent - 51:16 Advise - 1:24, 2:18, 3:1, 13:3 Advised - 2:14 Advocate - 6:14, 31:20, 36:14, 38:11 Affect - 23:15 Affected - 23:20, 23:21 Affirmed - 3:21, 3:23 Agenda - 88:12 Agree - 34:19, 42:13, 82:12, 86:22, 87:3, 87:5 Agreed - 32:6, 32:7 Agreement - 8:10, 8:11, 8:12, 16:13, 62:19 Agreements - 30:9 Aide - 40:14 Alberta - 9:8</p>	<p>Allocate - 17:4, 18:7, 18:10, 20:11, 54:17 Allocated - 17:2, 17:14, 27:2 Allocating - 19:7, 20:14 Allocation - 81:18, 82:3 Amendments - 60: 1 America - 5:22, 24:6 AMI - 44:12, 44:15, 71:20 Amongst - 7:23 Amount - 49:13 Amplification - 2:1 8 AMR - 44:12, 47:7, 72:3 Analysis - 7:21, 44:23 Annual - 14:12, 30:5 Anomaly - 16:4, 41:10 Anticipated - 85:14 Antilles - 5:23 Anymore - 62:3, 62:22 Anyway - 43:6 Apparently - 70:12 Appendices - 4:14 Appendix - 13:8 Apples - 62:22 Appliances - 51:22 Application - 1:16, 15:24, 16:7, 33:22, 34:8, 36:11, 36:12, 36:13, 36:23, 37:1, 37:2, 38:21, 49:15, 54:24, 54:25, 55:2, 55:12, 56:9, 56:20, 56:25, 57:1, 58:11, 58:14, 58:25, 63:9, 66:25, 87:5 Applications - 6:15 , 16:5, 57:22 Applies - 13:24 Apply - 13:25, 86:10 Appreciate - 69:10 Approach - 66:13, 70:17 Appropriate - 72:1 3, 73:18</p>	<p>Approved - 1:17 Approving - 51:2 April - 38:19 Arab - 7:12, 7:16, 7:23, 11:19, 12:17, 28:8 Arabia - 6:1, 8:21, 9:1, 11:20, 11:23 Area - 30:15, 30:17, 34:13, 54:13, 67:13, 67:19, 71:19, 80:5 Areas - 11:16, 48:10 Aren't - 26:17, 33:2 Argue - 62:25, 63:4 Argument - 17:12 Arises - 54:20, 60:2 Arising - 87:23, 88:5 Armenia - 5:21 Arose - 55:3 Arrived - 2:20 Arrives - 87:11 Aspect - 83:13, 87:16 Aspects - 8:15, 8:17, 11:7 Assessment - 83:1 5 Asset - 20:21, 29:2, 29:3, 29:7, 29:16, 75:1 Assets - 16:20, 20:5, 72:15, 72:16, 72:17, 72:23, 85:2 Assigned - 81:19, 85:2 Associated - 22:16 , 52:10, 85:25, 86:19 Associates - 5:9 August - 36:13 Australia - 5:22, 10:2, 10:5, 10:7, 10:8, 10:9 Authors - 75:18 Automation - 52:1 3, 80:13 Average - 14:25, 17:17, 17:21, 18:9, 50:21, 50:25, 51:4, 51:10, 51:14, 51:25, 78:4, 78:12, 78:22, 78:23, 79:17, 80:1, 80:4</p>	<p>Avoid - 47:1, 73:13 Avoided - 50:17 Aware - 19:16, 45:18, 45:20, 50:23, 63:11, 64:1 Awhile - 5:5</p> <p style="text-align: center;">B</p> <p>Back - 3:21, 20:21, 25:22, 27:23, 30:4, 30:11, 37:22, 50:10, 87:14, 87:25 Backdoor - 60:14 Backfeed - 23:12 Backup - 84:4 Balancing - 33:11 Bank - 12:14, 12:18, 13:1 Base - 16:7, 30:13, 33:21, 44:17, 54:16 Based - 39:1, 39:19, 61:24, 77:14 Basic - 16:25 Basis - 24:16, 24:19, 46:18, 51:4 Bate - 27:21 Battery - 51:17 Became - 29:18 Become - 25:2, 72:23 Becomes - 24:2, 25:9 Becoming - 11:21 Began - 4:17 Believes - 52:9, 76:8 Below - 31:1 Benefit - 44:23, 47:14, 54:15 Benefited - 30:18 Benefiting - 54:18 Benefits - 18:11, 23:13, 29:5, 29:6, 44:15, 44:20, 44:24, 44:25, 46:10, 46:19, 47:24, 73:13, 84:15 Big - 16:22, 17:13, 18:12, 20:8, 22:7 Bill - 47:17 Billings - 85:15 Bills - 47:21 Bit - 7:13, 9:5, 10:3, 24:6, 70:14 Block - 14:8, 31:21, 33:6 Board - 6:9, 6:18,</p>	<p>15:25, 16:6, 16:10, 31:18, 36:1, 38:10, 45:10, 47:22, 48:8, 51:1, 51:6, 51:11, 52:11, 56:24, 57:7, 57:12, 58:7, 58:9, 58:16, 58:20, 59:14, 60:8, 60:20, 60:22, 60:24, 61:2, 61:3, 61:19, 62:1, 62:20, 62:25, 73:17, 75:24, 76:24, 80:10, 88:20 Board's - 60:7 Boilers - 50:3, 50:13, 85:5, 85:25 Both - 5:2, 6:13, 6:14, 21:17, 21:18, 25:25, 32:7, 32:9, 37:15, 61:2, 85:22, 86:16 Bowman - 2:6, 2:22, 3:20, 3:23, 4:2, 4:4, 4:6, 4:21, 6:5, 6:10, 6:19, 7:5, 7:15, 8:25, 10:4, 10:15, 11:17, 12:6, 12:15, 13:14, 35:1, 35:3, 36:9, 37:3, 37:7, 38:1, 38:5, 41:7, 41:24, 42:25, 43:8, 52:20, 52:23, 53:14, 53:20, 54:3, 54:21, 55:5, 55:14, 55:19, 55:23, 56:3, 56:8, 56:12, 56:16, 57:3, 57:8, 57:15, 57:25, 58:8, 58:13, 58:17, 58:21, 59:1, 59:8, 59:16, 59:23, 60:4, 60:11, 60:16, 61:1, 61:7, 61:16, 61:21, 62:6, 62:12, 62:16, 63:3, 63:12, 63:23, 64:10, 64:15, 64:20, 65:1, 65:7, 65:14, 65:18, 66:3, 66:8, 66:16, 67:4, 67:10, 67:23, 68:9, 68:15, 69:5, 69:18, 70:3, 70:20, 70:25, 71:5, 71:9, 71:14, 72:8, 72:18, 72:22, 73:3, 73:8, 73:22, 74:2, 74:11, 74:17, 74:25, 75:8, 75:14, 76:12, 78:2,</p>
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