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<p>1 CHAIRMAN: 2 Q. So, I think Mr. Young, I'm going right to you. 3 MR. YOUNG: 4 Q. Thank you, Mr. Chair, I appreciate that. As 5 the parties and the Board are aware, there was 6 a pretty late breaking settlement on - 7 CHAIRMAN: 8 Q. Late breaking news. 9 MR. YOUNG: 10 Q. - late breaking news Friday afternoon, late in 11 the afternoon. Some parties were able to 12 achieve another settlement in the cost of 13 service matters. Of course, there was an 14 earlier one and this last one settles all but 15 a few of the issues. The parties only had an 16 opportunity to execute that this morning, but 17 I think the issues that have been settled have 18 been understood by the parties for some time 19 because the discussions had largely ended a 20 week or two ago. I won't go through the 21 settlement in detail; everybody has it. And I 22 think the Board is aware of it, but I will 23 just briefly touch upon the issues which 24 remain unresolved and which I understand 25 cross-examination is going to go on. I'm not</p>	<p>1 expert and testifying in this matter. If the 2 witness is able to be sworn or affirmed. 3 MR. ROBERT GRENEMAN (AFFIRMED) EXAMINATION-IN-CHIEF BY 4 MR. GEOFFREY YOUNG 5 MR. YOUNG: 6 Q. Mr. Chair, I don't have much in the way of 7 direct, other than to flesh out the matters 8 that I just discussed, so I would suggest that 9 Mr. Greneman is ready for cross-examination. 10 CHAIRMAN: 11 Q. So, I guess, we're to Mr. O'Brien. 12 MR. ROBERT GRENEMAN - CROSS-EXAMINATION BY MR. LIAM 13 O'BRIEN: 14 MR. O'BRIEN: 15 Q. Thank you, Mr. Chair. Good morning, Mr. 16 Greneman. 17 MR. GRENEMAN: 18 A. Good morning. 19 MR. O'BRIEN: 20 Q. My name is Liam O'Brien. I'm here as outside 21 counsel for Newfoundland Power. I do have a 22 few questions on a couple of areas here. 23 Maybe what we could do is start with the rural 24 deficit. With respect to the reports that 25 you've tendered into evidence here for this</p>
<p>1 going to suggest these are water tight 2 compartments and this is the only thing. But 3 the three items that I understand, most 4 parties have an interest in and that cross 5 examination is going to commence this morning 6 about and continue on for a few days at least 7 is, first, the allocation of the rural 8 deficit; the treatment of operating and 9 maintenance costs and its particularly 10 assigned methodology and the test your load 11 forecast and except for those three matters, 12 most everything else has been resolved. We're 13 pleased to be able to bring that news to the 14 Board this morning. 15 CHAIRMAN: 16 Q. So, we're now ready to go to your witness. 17 MR. GLYNN: 18 Q. Just one second, we just want to enter that 19 officially on the record as Consent No. 2. 20 Thank you. Now we can go to the witness. 21 CHAIRMAN: 22 Q. Now, we can go to the witness. 23 MR. YOUNG: 24 Q. Thank you, Mr. Chair. I'm pleased to present 25 Mr. Robert Greneman as Hydro's cost of service</p>	<p>1 hearing, I believe there were two. Is there 2 one from July of 2013, and then an addendum to 3 that in October of 2014, is that right? 4 MR. GRENEMAN: 5 A. Which would be known as Exhibit 9, and the 6 addendum to Exhibit 9, yes, that is correct. 7 MR. O'BRIEN: 8 Q. The initial report then in July of 2013 for 9 Exhibit 9, that report doesn't include any 10 opinion from you with respect to the 11 allocation of the rural deficit, does it? 12 Perhaps you can just quickly turn to it. 13 MR. GRENEMAN: 14 A. I don't believe it does. 15 MR. O'BRIEN: 16 Q. And I believe at the outset in the initial 17 filing, Hydro didn't take a position on any 18 methodology change with respect to the 19 allocation of the rural deficit. I'm 20 wondering were you asked to consider it at the 21 outset whether there should be a methodology 22 change in allocation? 23 MR. GRENEMAN: 24 A. When you say "the outset", do you mean at the 25 time of writing of the original exhibit?</p>

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<p>1 MR. O'BRIEN: 2 Q. Exactly. 3 MR. GRENEMAN: 4 A. I honestly do not recall. 5 MR. O'BRIEN: 6 Q. Okay. The first I see in the evidence where 7 you have expressed an opinion in any sort of 8 fashion is with the rebuttal evidence the 9 following year, is that accurate? 10 MR. GRENEMAN: 11 A. I believe that is accurate, yes. 12 MR. O'BRIEN: 13 Q. And can you tell me sort of why at that point 14 in time you had expressed an opinion on the 15 allocation, what triggered that? 16 MR. GRENEMAN: 17 A. I had reviewed the Board's methodology in its 18 1993 Order. I had reviewed Hydro's analysis, 19 and I had given my own thought to the issues 20 and had expressed my opinion on that. 21 MR. O'BRIEN: 22 Q. So when you say you reviewed Hydro's analysis, 23 were you given an analysis by Hydro to review 24 and ask is this an appropriate way of 25 allocating or are these appropriate way of</p>	<p>1 MR. GRENEMAN: 2 A. Excuse me, may I - just give me one moment. 3 MR. O'BRIEN: 4 Q. Oh, sure. 5 MR. GRENEMAN: 6 A. Is this the addendum we're looking at? 7 MR. O'BRIEN: 8 Q. This is the addendum we're looking at, yes. 9 MR. GRENEMAN: 10 A. And what page is that in the - 11 MR. O'BRIEN: 12 Q. It's Page 1 of the addendum after the Table of 13 Contents. 14 MR. GRENEMAN: 15 A. Yeah. 16 MR. O'BRIEN: 17 Q. Okay. So the second sentence there under 18 Section 2.1, "The parties generally agree that 19 paying for the under-recovery of costs from 20 other customers was not a cost of service 21 issue, but rather one of fairness". Do you 22 agree with that analysis? 23 MR. GRENEMAN: 24 A. I do. 25 MR. O'BRIEN:</p>
<p>1 allocating the rural deficit, do you recall? 2 MR. GRENEMAN: 3 A. In general, I would say yes, but I had applied 4 my own thought to my own conclusions and my 5 own reasoning in addition. 6 MR. O'BRIEN: 7 Q. Is this the first time you've been asked to 8 consider this type of an allocation and a cost 9 of service study? 10 MR. GRENEMAN: 11 A. In any jurisdiction, in any direct fashion, it 12 is. 13 MR. O'BRIEN: 14 Q. Okay, and in terms of your October - so 15 Exhibit 9, if we could just turn to the 16 addendum and Page 1 of that. 17 MR. GRENEMAN: 18 A. Yes. 19 MR. O'BRIEN: 20 Q. Okay. I'll just get it up on the screen here. 21 So Section 2.1 there on Page 1, this is your 22 comments on the rural deficit allocation, we 23 start at 2.1, and the second sentence there, 24 "The parties generally agree that paying for 25 the under-recovery of costs from other -</p>	<p>1 Q. Okay, and in terms of fairness, what we're 2 talking about here is the result, not 3 necessarily the methodology, is that right? 4 MR. GRENEMAN: 5 A. That is correct. 6 MR. O'BRIEN: 7 Q. Okay, and because we're really talking about 8 the under-recovery of costs from other 9 customers as opposed to a causal link with 10 these customers, we're really talking about 11 which type of result is the least unfair, is 12 that what we're looking at? It's not really 13 fair no matter which way we look at it? 14 MR. GRENEMAN: 15 A. I hesitate to agree with you. 16 MR. O'BRIEN: 17 Q. And why is that? 18 MR. GRENEMAN: 19 A. I just haven't thought of all the implications 20 yet, but I have not thought of it in terms of 21 the least unfair. 22 MR. O'BRIEN: 23 Q. Okay, but if we talk about from a general 24 perspective, none of these costs that we're 25 talking about allocating were caused - there's</p>

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<p>1 no causal relation to either the Labrador 2 Interconnected customers or Newfoundland 3 Power's customers, is that right? 4 MR. GRENEMAN: 5 A. That is correct. 6 MR. O'BRIEN: 7 Q. So in terms of whichever way we slice it for 8 an allocation, it's not fair to either party, 9 is it, they didn't cause those costs? 10 MR. GRENEMAN: 11 A. There's no causal cost relationship. 12 MR. O'BRIEN: 13 Q. So whichever way we look at it, it's unfair 14 for each party because they have to pay costs 15 that they didn't cause? 16 MR. GRENEMAN: 17 A. I don't know that I would go so far as to say 18 it's unfair for each party to pay the cost of 19 another entity. I don't know if I'd make that 20 bridge and say that. 21 MR. O'BRIEN: 22 Q. So you wouldn't necessarily go that far? 23 MR. GRENEMAN: 24 A. I would not necessarily go that far, correct. 25 MR. O'BRIEN:</p>	<p>1 asked to do this type of an allocation and a 2 cost of service study before other than in 3 this one? 4 MR. GRENEMAN: 5 A. Per se, specifically this, I have not. 6 MR. O'BRIEN: 7 Q. Would you agree with me that there could be a 8 number of different ways of allocating this, 9 all of which could seem fair? 10 MR. GRENEMAN: 11 A. It would depend upon the viewer. What seems 12 fair to one party may not seem fair to another 13 party. 14 MR. O'BRIEN: 15 Q. Okay. 16 MR. GRENEMAN: 17 A. So I would not necessarily agree, that there 18 may be several ways that would seem fair to 19 the same party. 20 MR. O'BRIEN: 21 Q. Okay, so there could be any number of opinions 22 in this room expressed on that, and some may 23 be fair and - with some elements, some may be 24 fair; with other elements, some may be unfair 25 with other elements, is that fair to say?</p>
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<p>1 Q. Are there any sort of cost of service 2 principles that would be applicable to an 3 allocation of this type of cost? 4 MR. GRENEMAN: 5 A. In general, I would say - in general, I would 6 say not. 7 MR. O'BRIEN: 8 Q. So we're sort of talking about an arbitrary 9 exercise when it comes down to it? 10 MR. GRENEMAN: 11 A. I would not characterize it as an arbitrary 12 exercise. I apologize for being evasive, but 13 I would not characterize it as an arbitrary 14 exercise necessarily. 15 MR. O'BRIEN: 16 Q. Can you explain that to me why you wouldn't 17 characterize it as arbitrary? 18 MR. GRENEMAN: 19 A. Arbitrary to me is random, and I don't think 20 random principles would apply in this case. 21 That is to say, you can't put your hand in a 22 hat and pick out any result and use it without 23 controversy. 24 MR. O'BRIEN: 25 Q. Okay. You've indicated that you haven't been</p>	<p>1 MR. GRENEMAN: 2 A. I suppose. 3 MR. O'BRIEN: 4 Q. There's any number of ways you can look at 5 this. 6 MR. GRENEMAN: 7 A. I suppose so. 8 MR. O'BRIEN: 9 Q. And any one of us can come up with an opinion 10 that says it's fair. In terms of your 11 expertise in what would be considered fair in 12 this type of an analysis, do you have any 13 specific expertise in what's fair? 14 MR. GRENEMAN: 15 A. I'm not sure of the word "expertise" is the 16 appropriate word to be applied to this 17 exercise. 18 MR. O'BRIEN: 19 Q. Okay, so, I mean, in - 20 MR. GRENEMAN: 21 A. It's not a scientific one. 22 MR. O'BRIEN: 23 Q. Right, okay, that's where I was going, I 24 guess, there's no scientific method here. I 25 mean, ultimately the experts in this</p>

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1 particular analysis would be the Board because
 2 they have to ultimately decide what's fair.
 3 Nobody is going to get up on the stand and
 4 talk about this and say I'm an expert in
 5 fairness.
 6 MR. GRENEMAN:
 7 A. I would agree with that.
 8 (9:30 a.m.)
 9 MR. O'BRIEN:
 10 Q. Okay. I want to point to a couple of the -
 11 read to you a few of the excerpts from the
 12 evidence here. First if we could pull up the
 13 2013 rebuttal evidence from May of 2014,
 14 sorry, so from the initial filing, the
 15 rebuttal evidence of May of 2014, and Page 2
 16 of that. Really I'm looking at lines 1 to 9.
 17 I'm going to read to you these sections and I
 18 just want you to consider them. In lines 1 to
 19 9, Hydro's rebuttal evidence indicate, "That
 20 approximately 30 percent of the forecast 2000
 21 test year revenue requirement from customers
 22 on the Labrador Interconnected System is
 23 attributable to the rural deficit. This
 24 compares to approximately 12 percent of the
 25 forecast 2000 test year revenue requirement

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1 from customers of Newfoundland Power. The
 2 material difference in the rate impact on the
 3 customers on the Labrador Interconnected
 4 System and the rate impact on the customers of
 5 Newfoundland Power has created a concern with
 6 respect to the reasonableness of the rural
 7 deficit allocation". So it appears at least
 8 from this statement that Hydro is concerned
 9 about impact as its main concern in terms of
 10 fairness here, is that fair to say?
 11 MR. GRENEMAN:
 12 A. I would say it's fair to say that Hydro and a
 13 number of other entities are also concerned
 14 with the issue.
 15 MR. O'BRIEN:
 16 Q. But impact was what was driving this, is that
 17 correct?
 18 MR. GRENEMAN:
 19 A. As it's stated, it appears that way, yes.
 20 MR. O'BRIEN:
 21 Q. And if we go to the evidence from the 2014
 22 filing, Section 4, and it's Page 4.7, lines 18
 23 to 21. There's a discussion here about the
 24 proposed rate increase again in terms of
 25 background. "The proposed rate increase for

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1 Labrador Interconnected rural customers of 2.1
 2 percent would increase to approximately 27. 8
 3 percent if the existing methodology was
 4 maintained", and that's the increase that we
 5 saw in the initial filing. "The proposed rate
 6 increase for 2.8 for Newfoundland Power's
 7 customers would decrease to approximately 2. 1
 8 if the existing methodology was maintained".
 9 So again we're talking about a concern about
 10 impact and rates, and that's what really drove
 11 the review of Hydro in this matter, is that
 12 right?
 13 MR. GRENEMAN:
 14 A. I understand that the Consumer Advocate was
 15 one party that initiated this review, so I
 16 don't know that it was Hydro all alone that
 17 initiated it.
 18 MR. O'BRIEN:
 19 Q. Okay, no, and that's fair to say, there were
 20 other parties that had concerns about impact.
 21 I guess, my point being is that it wasn't
 22 necessarily a methodology thing that drove
 23 this, it was more an impact thing that drove
 24 it?
 25 MR. GRENEMAN:

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1 A. It appears that that might be true.
 2 MR. O'BRIEN:
 3 Q. And you indicated earlier that in order to
 4 prepare some rebuttal evidence, you looked at
 5 the Board's Order from the generic cost of
 6 service hearing in '92, is that right?
 7 MR. GRENEMAN:
 8 A. That was one of the documents I looked at.
 9 MR. O'BRIEN:
 10 Q. And you're familiar then with that particular
 11 document and what the Board ordered at that
 12 time?
 13 MR. GRENEMAN:
 14 A. I don't know it verbatim, but I have reviewed
 15 it.
 16 MR. O'BRIEN:
 17 Q. And do you recall whether or not the Board had
 18 considered the idea of impact at that time?
 19 MR. GRENEMAN:
 20 A. The Board had considered the concept of impact
 21 at that time.
 22 MR. O'BRIEN:
 23 Q. And how was it that the Board decided impact
 24 should be dealt with?
 25 MR. GRENEMAN:

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<p>1 A. My recollection at that time is that the Board 2 indicated that, and I'm going from memory, 3 impact might be considered in terms of rate 4 design and phase in - in terms of phase in, 5 and I would need to look it up, but I 6 understand that the Board also indicated that 7 this matter of impact could be a continuing 8 issue in a later Order. 9 MR. O'BRIEN: 10 Q. Okay. I think you're right in terms of what 11 the Board had indicated. The Board did 12 separate the idea of methodology of allocation 13 from the idea of impact by saying impact is a 14 rate design thing you could look at, is that 15 correct? 16 MR. GRENEMAN: 17 A. I don't know if it's been separated per se, 18 but they have talked about impact separately. 19 I can't say that it's been separated per se. 20 MR. O'BRIEN: 21 Q. So when the Board says that the issue of 22 impact or rate shock could be dealt with by 23 way of rate design, they're not separating the 24 two? 25 MR. GRENEMAN:</p>	<p>1 indicating it was a mini cost of service type 2 of approach? 3 MR. GRENEMAN: 4 A. I do recall those words. 5 MR. O'BRIEN: 6 Q. Yeah, and you prepared yourself for the 2013 7 cost of service, you made some calculations on 8 the basis of Mr. Baker's mini cost of service 9 approach, is that right? 10 MR. GRENEMAN: 11 A. Can you direct me to that? 12 MR. O'BRIEN: 13 Q. Sure, let's have a look at that. If we look 14 at the 2013 filing, Exhibit 13, and Schedule 15 1.2.1, and Page 1 of that I believe it is, 16 1.2.1. I think it's up in the top right 17 corner there. Okay, if we can make that a 18 little bit bigger for Mr. Greneman. So we see 19 in columns 3, 4, and 5, demand energy 20 customer, there's three sort of commodities 21 that were looked at for the unit cost 22 approach. If we look down under underlined 23 10, we see \$15.27 per kilowatt for demand, 24 \$6.10 per megawatt hour for energy, and \$67.01 25 per customer on a dollar basis. You made</p>
<p>1 A. I'm not sure actually that an isolated 2 statement about rate impact separates the 3 issues or not. 4 MR. O'BRIEN: 5 Q. That wasn't your understanding then from 6 reading that? 7 MR. GRENEMAN: 8 A. It's not necessarily my conclusion. 9 MR. O'BRIEN: 10 Q. Okay, and the approach back in 1992 that the 11 Board ultimately landed on was a unit cost 12 approach, is that right? 13 MR. GRENEMAN: 14 A. Yes, I think it could be characterized that 15 way. 16 MR. O'BRIEN: 17 Q. And I think that's probably the way the 18 expert, Mr. Baker, had characterized it, but 19 it was more a commodity approach, I think, is 20 what he characterized it in his evidence, is 21 that right? 22 MR. GRENEMAN: 23 A. I do not know. 24 MR. O'BRIEN: 25 Q. All right. It was a mini - do you recall him</p>	<p>1 those calculations, did you? 2 MR. GRENEMAN: 3 A. I did not. 4 MR. O'BRIEN: 5 Q. You did not, okay. Who made those 6 calculations? 7 MR. GRENEMAN: 8 A. That was Hydro that made those calculations. 9 MR. O'BRIEN: 10 Q. All right. At any point have you looked at 11 the unit cost approach in making calculations 12 for the purposes of Hydro's filings? 13 MR. GRENEMAN: 14 A. I have. 15 MR. O'BRIEN: 16 Q. You have? 17 MR. GRENEMAN: 18 A. Yes. 19 MR. O'BRIEN: 20 Q. Okay, and at what point did you look at them? 21 MR. GRENEMAN: 22 A. In my general review. 23 MR. O'BRIEN: 24 Q. So the initial calculations were done by 25 Hydro, but did you review them after before</p>

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<p>1 filing?</p> <p>2 MR. GRENEMAN:</p> <p>3 A. I believe I did.</p> <p>4 MR. O'BRIEN:</p> <p>5 Q. So if we look at those calculations then under</p> <p>6 demand, energy, and customer, the idea is that</p> <p>7 using Mr. Baker's approach, each one of those</p> <p>8 would be equal for the Labrador Island</p> <p>9 customers and Newfoundland Power Customers, is</p> <p>10 that right?</p> <p>11 MR. GRENEMAN:</p> <p>12 A. My understanding is they would be equal and as</p> <p>13 an average they would represent neither the</p> <p>14 Island Interconnected nor Labrador.</p> <p>15 MR. O'BRIEN:</p> <p>16 Q. So it's some sort of mishmash that an average</p> <p>17 would represent that, but not necessarily one</p> <p>18 or the other in isolation?</p> <p>19 MR. GRENEMAN:</p> <p>20 A. Definitely not one or the other.</p> <p>21 MR. O'BRIEN:</p> <p>22 Q. So the more recent calculation that Hydro has</p> <p>23 done for its 2014 filing is not based on Mr.</p> <p>24 Baker's method, is that right?</p> <p>25 MR. GRENEMAN:</p>	<p>1 A. It is, that's true.</p> <p>2 MR. O'BRIEN:</p> <p>3 Q. And that revenue method that was considered</p> <p>4 back in 1992?</p> <p>5 MR. GRENEMAN:</p> <p>6 A. It was advanced by Hydro in 1992.</p> <p>7 MR. O'BRIEN:</p> <p>8 Q. And it was rejected by the Board at that time?</p> <p>9 MR. GRENEMAN:</p> <p>10 A. Yes.</p> <p>11 MR. O'BRIEN:</p> <p>12 Q. And do you know why it was rejected by the</p> <p>13 Board at that time?</p> <p>14 MR. GRENEMAN:</p> <p>15 A. No.</p> <p>16 MR. O'BRIEN:</p> <p>17 Q. It's my understanding that it was rejected</p> <p>18 because the Board had some concerns about the</p> <p>19 fact that it would look as though Newfoundland</p> <p>20 Power's customers, who were paying higher on a</p> <p>21 cost of service basis, were going to be asked</p> <p>22 to pay higher because they're already paying</p> <p>23 higher on a revenue requirement basis. Does</p> <p>24 that make sense?</p> <p>25 MR. GRENEMAN:</p>
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<p>1 A. I don't believe so.</p> <p>2 MR. O'BRIEN:</p> <p>3 Q. And it provided a couple of alternatives to</p> <p>4 Mr. Baker's method, is that right?</p> <p>5 MR. GRENEMAN:</p> <p>6 A. That's correct.</p> <p>7 MR. O'BRIEN:</p> <p>8 Q. And were they based on your recommendation or</p> <p>9 was it something that Hydro came up with</p> <p>10 themselves and you agreed with it?</p> <p>11 MR. GRENEMAN:</p> <p>12 A. It is something that Hydro advanced as the</p> <p>13 recommended solution in 1992, and continued to</p> <p>14 advance in this proceeding, and my independent</p> <p>15 review of what the Board did in 1992, and as</p> <p>16 ordered in 1993, and of Hydro's analysis, I do</p> <p>17 believe that the revenue method of allocation</p> <p>18 is the most fair method. It has attributes</p> <p>19 that the current method does not have.</p> <p>20 MR. O'BRIEN:</p> <p>21 Q. So it's your belief that the revenue method is</p> <p>22 the appropriate belief as opposed to the cost</p> <p>23 method where each customer has the same cost</p> <p>24 allocation?</p> <p>25 MR. GRENEMAN:</p>	<p>1 A. Does it make sense? You're telling me what</p> <p>2 the Board's reasoning is?</p> <p>3 MR. O'BRIEN:</p> <p>4 Q. Yeah, yeah.</p> <p>5 MR. GRENEMAN:</p> <p>6 A. And I'll accept your opinion of what the</p> <p>7 Board's reasoning is.</p> <p>8 MR. O'BRIEN:</p> <p>9 Q. Okay.</p> <p>10 MR. GRENEMAN:</p> <p>11 A. I don't recall that, but if it's true, it's</p> <p>12 true.</p> <p>13 MR. O'BRIEN:</p> <p>14 Q. But is that a concern for you if Newfoundland</p> <p>15 Power's customers, who are paying higher on a</p> <p>16 cost of service basis, are being asked to pay</p> <p>17 more just because they're already paying</p> <p>18 higher on a cost of service basis? That's how</p> <p>19 the revenue requirement method would work,</p> <p>20 wouldn't it?</p> <p>21 MR. GRENEMAN:</p> <p>22 A. Can you repeat that question?</p> <p>23 MR. O'BRIEN:</p> <p>24 Q. Okay. On a revenue requirement basis, you</p> <p>25 would take each customer, each group, and look</p>

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1 at the revenue requirement and determine on
 2 how to make the allocation.
 3 MR. GRENEMAN:
 4 A. Right.
 5 MR. O'BRIEN:
 6 Q. But if one group like Newfoundland Power's
 7 customers are already paying higher on a cost
 8 of service basis than the other group, the
 9 Labrador customers, then they are going to be
 10 asked to pay more on the revenue requirement
 11 basis because they're already paying higher -
 12 MR. GRENEMAN:
 13 A. Yes.
 14 MR. O'BRIEN:
 15 Q. Is that right?
 16 MR. GRENEMAN:
 17 A. No, it's not because - the "because" is not
 18 the central link in what you said.
 19 MR. O'BRIEN:
 20 Q. Explain that to me?
 21 MR. GRENEMAN:
 22 A. They're not being asked to pay more because,
 23 as you posed the question, so I don't accept
 24 the premise of the question. It's not
 25 "because they were paying higher", it's for a

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1 different reason.
 2 MR. O'BRIEN:
 3 Q. And what's the other reason, what's the
 4 reason?
 5 MR. GRENEMAN:
 6 A. Well, that's expressed in the evidence.
 7 MR. O'BRIEN:
 8 Q. So the reason is - maybe you could tell me?
 9 MR. GRENEMAN:
 10 A. The current method, I believe, is unfair. If
 11 there's another methodology under which NP
 12 pays more, the reason is not because they were
 13 paying more before. I don't - you sort of
 14 expressed it as a necessary link, which didn't
 15 sit right with me.
 16 MR. O'BRIEN:
 17 Q. Okay, well, maybe if I put it this way,
 18 perhaps there's no necessary link in that the
 19 Board is saying you pay that because you're
 20 paying higher, but it would look as though
 21 that's what's happening, isn't that the
 22 outcome?
 23 (9:45 a.m.)
 24 MR. GRENEMAN:
 25 A. Perhaps to some viewers, perhaps not to all.

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1 MR. O'BRIEN:
 2 Q. In Hydro's evidence that uses a - if we turn
 3 to Page 4.9 of the Evidence, Table 4.2. The
 4 revenue to cost ratio, did you have any
 5 involvement in preparing this particular
 6 table?
 7 MR. GRENEMAN:
 8 A. I did not.
 9 MR. O'BRIEN:
 10 Q. Have you seen the table before?
 11 MR. GRENEMAN:
 12 A. I have.
 13 MR. O'BRIEN:
 14 Q. Okay. The cost of service study itself, I
 15 think these figures might come out of that
 16 study itself. When you look at revenue to
 17 cost ratios, I guess there's a numerator and a
 18 denominator, is that right? The numerator is
 19 your revenue and the denominator is your cost?
 20 MR. GRENEMAN:
 21 A. Yes, correct.
 22 MR. O'BRIEN:
 23 Q. So in order to come up with a true revenue to
 24 cost ratio, you would put in all revenue and
 25 all cost, is that right; otherwise, it doesn't

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1 make sense?
 2 MR. GRENEMAN:
 3 A. I'll accept that provisionally, yes.
 4 MR. O'BRIEN:
 5 Q. Okay. So in this particular case, we don't
 6 have - in order to get the Labrador
 7 Interconnected to 1.42, I presume what has
 8 been done here is that the portion of the
 9 allocation from the rural deficit is put into
 10 the revenue, into the numerator, but it's not
 11 put into the denominator?
 12 MR. GRENEMAN:
 13 A. That's my understanding.
 14 MR. O'BRIEN:
 15 Q. Okay. Do you use these types of ratios to
 16 analyze fairness for allocation of non-costs,
 17 is that something that's generally done?
 18 MR. GRENEMAN:
 19 A. For non -
 20 MR. O'BRIEN:
 21 Q. For non-costs?
 22 MR. GRENEMAN:
 23 A. Non-costs?
 24 MR. O'BRIEN:
 25 Q. Yeah.

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<p>1 MR. GRENEMAN: 2 A. I think what we're looking at here when you 3 talk about what is generally done, I would 4 say, yes, that is included for non-cost. 5 MR. O'BRIEN: 6 Q. So if you had a non-cost here, wouldn't we 7 have the deficit put into the cost as well as 8 put into the revenue in order to get a true 9 ratio? You should come up with 1, shouldn't 10 you? 11 MR. GRENEMAN: 12 A. That's not the way it works in Canada, is my 13 understanding. 14 MR. O'BRIEN: 15 Q. Okay. When you use these revenue to cost 16 ratios generally, are they used for sort of 17 tweaking rates to see if, say, one customer is 18 paying a little bit more than their cost or a 19 little bit less, you tweak the rates just so 20 you try to get it as close to 1 as possible, 21 that's what they're used for generally, isn't 22 it? 23 MR. GRENEMAN: 24 A. That is one thing they are used for. 25 MR. O'BRIEN:</p>	<p>1 say that I have seen it. 2 MR. O'BRIEN: 3 Q. If we had a situation where one of the other 4 options here that Hydro has put forward is 5 each customer sort of pays the same on 6 average- 7 MR. GRENEMAN: 8 A. The same what? 9 MR. O'BRIEN: 10 Q. The same allocation. I think it's spread out 11 - if you look at both Newfoundland Power and 12 the island customers, you have them each 13 paying the same on an annual basis. 14 MR. GRENEMAN: 15 A. I don't under "the same". 16 MR. O'BRIEN: 17 Q. Maybe we can have a look at the - if we move 18 towards - just scroll down there. The 19 alternative approaches, here we go, the number 20 of customers method, and, I guess, the idea 21 there is that Labrador Interconnected and 22 Newfoundland Power customers, if you used the 23 number of customers method, they'd all pay the 24 same on average. Are you familiar with that 25 particular method?</p>
<p>Page 30</p> <p>1 Q. They're not generally used as a measure of 2 fairness, are they? 3 MR. GRENEMAN: 4 A. They could be used as a measure of fairness. 5 MR. O'BRIEN: 6 Q. Have you ever seen them used as a measure of 7 fairness in this type of situation? 8 MR. GRENEMAN: 9 A. Yes. 10 MR. O'BRIEN: 11 Q. And where would you have seen that? 12 MR. GRENEMAN: 13 A. I think it could happen in almost every 14 jurisdiction. For example, my understanding 15 is, for example, in Nova Scotia, there is a 16 range in revenue to cost coverage of, and I'm 17 going by memory and subject to check, of 0.95 18 to 1.05. So if the Commission or the Board 19 says, well, we should make domestic, for 20 example, a little bit less, and, for example, 21 general service, for example, may pick up the 22 difference, and I would characterize for 23 purpose of this discussion that the subsidy, 24 if you will, to domestic is a non-cost to 25 general service. So in that context, I would</p>	<p>Page 32</p> <p>1 MR. GRENEMAN: 2 A. Are you referring to Hydro's second preferred 3 method? 4 MR. O'BRIEN: 5 Q. Yes. 6 MR. GRENEMAN: 7 A. To me, the revenue allocation method is far 8 superior to that. 9 MR. O'BRIEN: 10 Q. Okay. If you use the number of customers 11 method, you wouldn't necessarily get the 12 revenue to cost ratios being the same as you 13 did with the revenue allocation method, would 14 you? 15 MR. GRENEMAN: 16 A. I am not sure. I would need to look at it and 17 study it. 18 MR. O'BRIEN: 19 Q. Okay, but you're putting forward the revenue 20 requirement as the - 21 MR. GRENEMAN: 22 A. Personally, that is my preference. 23 MR. O'BRIEN: 24 Q. Okay. Now in terms of that revenue 25 requirement method, has anything in terms of</p>

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1 the essential underpinnings of the method
 2 changed since 1992?
 3 MR. GRENEMAN:
 4 A. They have.
 5 MR. O'BRIEN:
 6 Q. And what's that?
 7 MR. GRENEMAN:
 8 A. Subsequent to 1992, uniform rates were phased
 9 in in Labrador. Customers in Labrador did not
 10 pay the rural deficit until 2002, at which
 11 time the charge for the rural deficit was
 12 largely offset by the CFB Goose Bay secondary
 13 credit. In 1992, industrial customers were
 14 subject to the allocation of the rural
 15 deficit. Subsequent to that, they were not.
 16 I believe those are the principal changes.
 17 MR. O'BRIEN:
 18 Q. Those are the principal changes, and that
 19 comes down really to impact, though, doesn't
 20 it, whether or not they're being reflected in
 21 the rates versus whether or not the
 22 methodology is the appropriate methodology?
 23 MR. GRENEMAN:
 24 A. Impact on?
 25 MR. O'BRIEN:

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1 Q. In terms of whether or not the Labrador
 2 customers see it on their bill, and they
 3 actually feel the impact of that?
 4 MR. GRENEMAN:
 5 A. This proceeding, I understand, is the -
 6 MR. O'BRIEN:
 7 Q. Is the first time -
 8 MR. GRENEMAN:
 9 A. The first in which they would see the full
 10 impact.
 11 MR. O'BRIEN:
 12 Q. They would have seen the full impact, but for
 13 the subsidies after 1992 and those changes, is
 14 that right?
 15 MR. GRENEMAN:
 16 A. I would agree with that.
 17 MR. O'BRIEN:
 18 Q. So the Board at that time knew or ought to
 19 have known that the impact was coming. They
 20 wouldn't have necessarily foreseen what was
 21 going to happen in the future in terms of
 22 subsidies?
 23 MR. GRENEMAN:
 24 A. Okay.
 25 MR. O'BRIEN:

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1 Q. So there's really no change for the Board this
 2 time around than from 1992 in terms of those
 3 underpinnings?
 4 MR. GRENEMAN:
 5 A. It's really hard to say what the Board
 6 understood in 1992. I wasn't there, and I
 7 would only be surmising what the Board
 8 anticipated with respect to any future impact.
 9 MR. O'BRIEN:
 10 Q. Well, I understood from reading the Board's
 11 Order, that the Board understood the Labrador
 12 customers would pay twice what Newfoundland
 13 Power's customers would as a result of the
 14 1992/1993 order. Is that your understanding
 15 as well?
 16 MR. GRENEMAN:
 17 A. I would have to read it again.
 18 MR. O'BRIEN:
 19 Q. Okay, but subject to check, if that's what the
 20 Board said, that's reflective of the Board
 21 understanding there's going to be an impact to
 22 Labrador customers which is different than the
 23 impact to Newfoundland Power's customers?
 24 MR. GRENEMAN:
 25 A. You're asking me to say "subject to check"?

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1 MR. O'BRIEN:
 2 Q. Yeah.
 3 MR. GRENEMAN:
 4 A. I would have to even read it to say subject to
 5 that very specific sentence, or any
 6 qualifications. I can't even say, subject to
 7 check.
 8 MR. O'BRIEN:
 9 Q. Okay. In terms of where we are now, I guess,
 10 the present allocation method would have
 11 essentially each customer paying based on
 12 those combination of factors that we looked
 13 at, the demand per kilowatt, the energy per
 14 kilowatt hour, and customer base as well, is
 15 that right? There's a number of factors that
 16 are looked at.
 17 MR. GRENEMAN:
 18 A. Those are three of them, but not the only
 19 three.
 20 MR. O'BRIEN:
 21 Q. What other factors?
 22 MR. GRENEMAN:
 23 A. Per unit, you say?
 24 MR. O'BRIEN:
 25 Q. Yeah, per unit, based on the present

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1 methodology?

2 MR. GRENEMAN:

3 A. And the other factors are usage

4 (unintelligible).

5 MR. O'BRIEN:

6 Q. Right, okay.

7 MR. GRENEMAN:

8 A. Right.

9 MR. O'BRIEN:

10 Q. So with respect to usage then, I understand

11 that Hydro's position, and a number of the

12 other intervenors take issue with the fact

13 that Labrador Interconnected customers are

14 paying more by virtue of having to use more

15 energy on the usage basis, where they're in a

16 colder climate, is that right?

17 MR. GRENEMAN:

18 A. That is a factor.

19 MR. O'BRIEN:

20 Q. Okay, and that's really for all intents and

21 purposes an accident of location as to where

22 they are, they're in a colder climate versus

23 Newfoundland Power's customers where they are,

24 is that right?

25 MR. GRENEMAN:

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1 A. It's in part an accident of location.

2 MR. O'BRIEN:

3 Q. And on the other side of things, Newfoundland

4 Power's customers are on the island where they

5 would rely on thermal energy as opposed to

6 Labrador Interconnected customers which

7 wouldn't, and as a result Newfoundland Power's

8 customers regular rates are higher, isn't that

9 right?

10 MR. GRENEMAN:

11 A. Yes.

12 MR. O'BRIEN:

13 Q. And again another accident of location? I

14 think you're struggling with the word

15 "accident", is that right?

16 MR. GRENEMAN:

17 A. That's correct.

18 MR. O'BRIEN:

19 Q. Okay, but if we assume then it's because of

20 where both groups are located -

21 MR. GRENEMAN:

22 A. Yes.

23 MR. O'BRIEN:

24 Q. All right?

25 MR. GRENEMAN:

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1 A. Yes.

2 MR. O'BRIEN:

3 Q. Okay, so isn't there a reasonableness there

4 with the present method because of that,

5 doesn't it weigh both of those issues?

6 MR. GRENEMAN:

7 A. I don't think so.

8 MR. O'BRIEN:

9 Q. Why not?

10 MR. GRENEMAN:

11 A. The end result is what matters, and I don't

12 think that the end result is fair.

13 MR. O'BRIEN:

14 Q. So the end result in your mind would have

15 Newfoundland Power's customers on the revenue

16 requirement method paying more than Labrador

17 Interconnected customers. The table we have

18 on the screen right now, that's what that

19 shows.

20 MR. GRENEMAN:

21 A. There are a number of consequences of the

22 revenue method. If you want to pick out one

23 of them, the one you just mentioned, that

24 would be simply just one, but there are

25 benefits that outweigh that one that you just

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1 selected.

2 MR. O'BRIEN:

3 Q. So the one I'm selecting is cost, right,

4 that's just really the - if we look at who

5 pays more, that's only one factor?

6 MR. GRENEMAN:

7 A. That's one factor.

8 MR. O'BRIEN:

9 Q. What other factors should we be looking at?

10 (10:00 a.m.)

11 MR. GRENEMAN:

12 A. Other factors that are of concern in my view

13 are - and this is not necessarily in terms of

14 importance, but transparency in the process,

15 that is understandability why certain

16 customers pay a certain amount with respect to

17 other customers, administrative ease and ease

18 of application. What I think is extremely

19 important that the current methodology does

20 not have is stability. As customer profiles

21 change or as market conditions change over

22 time, I don't believe necessarily the current

23 method has that, but I do believe that

24 whatever happens in the future with respect to

25 the in-feed, climate change, customer profile

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1 changes, that the revenue method is far
 2 superior insofar as stability is concerned,
 3 and not looking for additional fixes down the
 4 road. What I think is important is perception
 5 of fairness, which I think the revenue method
 6 has, and the current method does not have. In
 7 terms of public policy, the current
 8 methodology penalizes customers simply because
 9 they have a lower rate and live in a colder
 10 climate, and that's picking out just one
 11 variable. I don't believe that the current
 12 method is appropriate for a number of reasons,
 13 one of which is that by averaging, it's
 14 correct for neither the Island interconnected
 15 costumers or for Labrador. It represents a
 16 solution for neither.

17 MR. O'BRIEN:
 18 Q. When you talk about public policy about
 19 penalizing because one set of customers have a
 20 lower rate, aren't we getting back to now one
 21 of the concerns the Board had in 1992 about
 22 Newfoundland Power's customers being penalized
 23 because they already pay a higher rate, when
 24 you use a revenue requirement method?
 25 MR. GRENEMAN:

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1 A. If that is your view, then -
 2 MR. O'BRIEN:
 3 Q. Okay, and could there be any other factors
 4 that we're failing to consider here? I
 5 understand that those were some that you've
 6 come up with now, but there could be any other
 7 factors? We are looking at in a few years
 8 time a major change to the system. I'm
 9 wondering whether or not - what your views are
 10 on whether staying with the allocation method
 11 we have now until, say, we have a cost of
 12 service study that considers the impact of the
 13 change in the systems, some major changes in
 14 the systems, whether that would be
 15 appropriate?
 16 MR. GRENEMAN:
 17 A. I do not think it would be appropriate.
 18 MR. O'BRIEN:
 19 Q. And why not?
 20 MR. GRENEMAN:
 21 A. It still hangs its hat, so to speak, on cost
 22 of service, and I don't think it's related to
 23 components of cost of service per se. I think
 24 it's related to the total result. Revenue
 25 requirement has each customer paying the same

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1 proportion of their bill. I don't think, in
 2 my view, that basing this on cost of service
 3 structure, rate structure, is the appropriate
 4 thing to do, and to do what you just suggested
 5 would be to continue to do that.

6 MR. O'BRIEN:
 7 Q. We could have a situation now in a couple of
 8 years time when we have a better
 9 foreseeability as to what cost of service,
 10 putting aside the allocation, where we might
 11 have to make some changes, anyway, with the
 12 allocation. Isn't that fair to say?
 13 MR. GRENEMAN:
 14 A. I don't think that's relevant.
 15 MR. O'BRIEN:
 16 Q. No?
 17 MR. GRENEMAN:
 18 A. No.
 19 MR. O'BRIEN:
 20 Q. And why?
 21 MR. GRENEMAN:
 22 A. I don't think it's relevant. I don't think
 23 it's appropriate now, and how it would change
 24 in a few years from now, I don't think it
 25 would be appropriate then for the same reason.

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1 MR. O'BRIEN:
 2 Q. So in your mind, no matter what happens in the
 3 future, revenue requirement method has to be
 4 the superior method here?
 5 MR. GRENEMAN:
 6 A. In my consideration of this, yes, I do.
 7 MR. O'BRIEN:
 8 Q. So there will be no reason at any time in the
 9 future to revisit this based on the major
 10 changes to the systems?
 11 MR. GRENEMAN:
 12 A. I do not think so. I think it's a very
 13 simple, transparent, explainable, fair
 14 methodology. It would be hard to envision
 15 anything that happens that would not make it
 16 fair.
 17 MR. O'BRIEN:
 18 Q. Would there be any factors such as, I don't
 19 know, value of service or opportunity costs or
 20 anything like that that could be considered by
 21 the Board here, would they have any relevance?
 22 MR. GRENEMAN:
 23 A. I don't know the answer. As I said here, I
 24 would need to think about it.
 25 MR. O'BRIEN:

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1 Q. And if that's the case, if there are factors
 2 that you could require some thought, again why
 3 wouldn't it be appropriate to think of that
 4 and have a more full analysis of this once we
 5 see what's going to happen in terms of major
 6 changes to the system?
 7 MR. GRENEMAN:
 8 A. Value of service opens up a lot of areas to
 9 the extent that value of service is reflected
 10 rates which it could be then I would say that
 11 that acts in support of the revenue method. I
 12 would not--no, the answer is no, I don't think
 13 it would, having thought about it just now.
 14 Only to the extent that value of service is--
 15 only to the extent that rates are based on
 16 value of service and nothing else.
 17 MR. O'BRIEN:
 18 Q. Can you explain that to me?
 19 MR. GRENEMAN:
 20 A. Or it could be based on value of service. So,
 21 my view is that the revenue method is equal
 22 for--an equal percent for both Labrador
 23 Interconnected and Island Interconnected if
 24 rates are based on cost now or cost and some
 25 component of value of service in the future.

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1 But there are other ways of introducing value
 2 of service and for those other ways that are
 3 not directly reflected in rates and the end
 4 revenue requirement, the answer to your
 5 question, I would say is no.
 6 MR. O'BRIEN:
 7 Q. I just have a few more questions for you,
 8 Doctor (sic.). The specifically assigned
 9 charges, you did provide some comment in
 10 rebuttal evidence in 2013, I wonder if we
 11 could bring that up, May 30, 2014 filing.
 12 MS. GRAY:
 13 Q. Sorry, the May -
 14 MR. O'BRIEN:
 15 Q. May 30, 2014 filing, but it would have been
 16 under the--yes, okay. Page A3 there's an
 17 appendix there with Mr. Greneman's--okay,
 18 yeah, if we can just go back up there under
 19 the heading "specifically assigned charges".
 20 And this is your rebuttal evidence, I guess,
 21 with respect to Mr. Dean's comments. So in
 22 this, if we look to page A3, is that what
 23 we're on here?
 24 MS. GRAY:
 25 Q. No, we're on A2.

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1 MR. O'BRIEN:
 2 Q. Sorry, A3. Under discussion and
 3 recommendation, line nine and ten -- sorry,
 4 line eight to ten, "Hydro's cost of service
 5 study allocates O&M expenses within each
 6 system based on original cost gross plant.
 7 Although this is the most widely used
 8 methodology to allocate O&M expenses among
 9 North American utilities, it's acknowledged
 10 that an inequitable allocation of O&M can
 11 result due to significant newer plant
 12 additions associated with certain ICs."
 13 When you say it's the most widely used
 14 methodology to allocate O&M expenses, are you
 15 aware of any other methodologies for
 16 allocation?
 17 MR. GRENEMAN:
 18 A. In instances -- in general, without
 19 extenuating circumstance, as we may be looking
 20 at here, I am not offhand familiar with other
 21 methodologies. But I am aware of the fact
 22 that where O&M is not appropriately --
 23 allocated O&M does not appropriately reflect
 24 O&M for certain functions or customers that
 25 O&M may be treated differently by, for

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1 example, agreement or segregating out classes
 2 of plant assets for O&M for separate
 3 treatment.
 4 MR. O'BRIEN:
 5 Q. And would that generally be by agreement as
 6 opposed to cost of service methodologies that
 7 you'd be familiar with?
 8 MR. GRENEMAN:
 9 A. It could be by cost of service methodology.
 10 MR. O'BRIEN:
 11 Q. All right. And you are familiar with this
 12 particular method which Mr. Dean has offered
 13 in any other jurisdiction?
 14 MR. GRENEMAN:
 15 A. Not per se. It may -- and I'm just guessing
 16 here, there are fair value jurisdictions in
 17 the United States and I'm only surmising and I
 18 have not looked it up, that if plant is
 19 trended or restated at current cost and in a
 20 fair value jurisdiction, that might be
 21 tantamount to what is being proposed here, but
 22 I have not -- I have no backup as I sit here
 23 with respect to that.
 24 MR. O'BRIEN:
 25 Q. Okay. And I noted from your evidence that you

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<p>1 offered an alternative solution here of really</p> <p>2 going back and deescalating specifically</p> <p>3 assigned plant additions back to 2007. Is</p> <p>4 that right?</p> <p>5 MR. GRENEMAN:</p> <p>6 A. Yes. That was not intended to be a complete</p> <p>7 solution, but only to open the door to</p> <p>8 discussions on how a more equitable allocation</p> <p>9 could be achieved.</p> <p>10 MR. O'BRIEN:</p> <p>11 Q. And actually, you've taken me to my next</p> <p>12 question. I think that was more what I was</p> <p>13 concerned about. That was not necessarily a</p> <p>14 solution; it was more to look at a more</p> <p>15 comprehensive analysis down the road. Is that</p> <p>16 right?</p> <p>17 MR. GRENEMAN:</p> <p>18 A. That's correct.</p> <p>19 MR. O'BRIEN:</p> <p>20 Q. Okay. And would you be a proponent of a more</p> <p>21 comprehensive analysis as opposed to right now</p> <p>22 making this particular change in methodology?</p> <p>23 MR. GRENEMAN:</p> <p>24 A. I think a more comprehensive analysis has its</p> <p>25 merits in a couple of ways. Number one, older</p>	<p>1 A. I do not either.</p> <p>2 MR. O'BRIEN:</p> <p>3 Q. No, okay. Is there any benefit to doing a</p> <p>4 more comprehensive analysis rather than make a</p> <p>5 decision right now? We do have a cost of</p> <p>6 service study which we expect to happen in the</p> <p>7 next year or two. Is there any more benefit?</p> <p>8 MR. GRENEMAN:</p> <p>9 A. When you say make a decision right now, I'm</p> <p>10 not sure what you're referring to.</p> <p>11 MR. O'BRIEN:</p> <p>12 Q. I mean for the Board to make a decision right</p> <p>13 now to change that methodology, would there be</p> <p>14 any benefit to a more comprehensive review</p> <p>15 before doing that?</p> <p>16 MR. GRENEMAN:</p> <p>17 A. I don't think there's any benefit to doing a</p> <p>18 more comprehensive review.</p> <p>19 MR. O'BRIEN:</p> <p>20 Q. Okay. The last question I had for you, Mr.</p> <p>21 Greneman, had to do with the hydraulic</p> <p>22 variation component to the RSP.</p> <p>23 MR. GRENEMAN:</p> <p>24 A. Yes.</p> <p>25 MR. O'BRIEN:</p>
<p>1 plant tends to require more O&M and newer</p> <p>2 plant tends to require less O&M, so by</p> <p>3 restating plant, old plant to a current value,</p> <p>4 it sort of equalizes that difference that</p> <p>5 doesn't exist that -- I'm sorry, the inequity</p> <p>6 or whatever we call it that exists under the</p> <p>7 current methodology. Also restating plant to</p> <p>8 current dollars does not give an inordinate</p> <p>9 amount of O&M to new transmission facilities</p> <p>10 that are applicable to, for example, Vale.</p> <p>11 MR. O'BRIEN:</p> <p>12 Q. So would you be concerned though rather than</p> <p>13 without the comprehensive analysis to making a</p> <p>14 decision right now, would you be concerned</p> <p>15 about any unintended effects or knock-on</p> <p>16 effects that you might want to look at this a</p> <p>17 little bit more in depth before making a</p> <p>18 change in methodology?</p> <p>19 (10:15 a.m.)</p> <p>20 MR. GRENEMAN:</p> <p>21 A. If you can give me an example of -</p> <p>22 MR. O'BRIEN:</p> <p>23 Q. I don't have an example and I'm asking you if</p> <p>24 you want -</p> <p>25 MR. GRENEMAN:</p>	<p>1 Q. You're familiar with that in terms of your</p> <p>2 initial evidence. I'm more concerned about</p> <p>3 whether you would support Hydro's position in</p> <p>4 its evidence that it would be appropriate to</p> <p>5 be modified on an energy basis. Would you</p> <p>6 agree with that?</p> <p>7 MR. GRENEMAN:</p> <p>8 A. I think I'd like to pass that question on to</p> <p>9 Mr. Fagan.</p> <p>10 MR. O'BRIEN:</p> <p>11 Q. Fair, okay. I have no further questions, Mr.</p> <p>12 Chair.</p> <p>13 CHAIRMAN:</p> <p>14 Q. I think we're over to you, Mr. Johnson.</p> <p>15 MR. ROBERT GRENEMAN, CROSS-EXAMINATION BY THOMAS JOHNSON,</p> <p>16 Q.C.</p> <p>17 JOHNSON, Q.C.:</p> <p>18 Q. Good morning, Mr. Greneman.</p> <p>19 MR. GRENEMAN:</p> <p>20 A. Good morning.</p> <p>21 JOHNSON, Q.C.:</p> <p>22 Q. Mr. Greneman, I wish to start off in relation</p> <p>23 to the issue of load forecast, which is still</p> <p>24 a matter that's left to be resolved. I'll</p> <p>25 just start off, I guess, with this</p>

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<p>1 proposition, Mr. Greneman. I take it that you 2 would -- can you hear me? 3 MR. GRENEMAN: 4 A. No. Very low. I could barely hear you. 5 JOHNSON, Q.C.: 6 Q. Okay. I take it, Mr. Greneman, that the rates 7 -- that you understand that the rates as 8 proposed in Hydro's Amended General Rate 9 Application are expected to be in effect for 10 the 2015 through 2017 time frame. 11 MR. GRENEMAN: 12 A. I'll accept that. 13 JOHNSON, Q.C.: 14 Q. And Mr. Greneman, would you agree that the 15 rates that Hydro charges its customers must be 16 just and reasonable at all times, including 17 the 2015 to 2017 period? 18 MR. GRENEMAN: 19 A. Reasonably just and reasonable. 20 JOHNSON, Q.C.: 21 Q. Okay. Now I'd like to just bring your 22 attention, if I could, to the table at CA-NLH- 23 304, and particularly this purports, Mr. 24 Greneman, to show the load increases relative 25 to 2015 over 2016 and 2017. I'll just give</p>	<p>1 operations of Vale and Praxair. Are you 2 familiar with that, that that's the reason 3 this is being driven up? 4 MR. GRENEMAN: 5 A. That's my understanding. 6 JOHNSON, Q.C.: 7 Q. Right. And in 2016, Mr. Greneman, would you 8 accept, subject to check because the 9 percentages are not here, that in 2016 10 relative to 2015 that the Island Industrial 11 Customer class energy sales are forecast to 12 increase by 25.2 percent over levels assumed 13 in the 2015 test year? Would you take that, 14 subject to check? 15 MR. GRENEMAN: 16 A. Subject to check, yes. 17 JOHNSON, Q.C.: 18 Q. Okay. And in contrast, Newfoundland Power 19 energy sales are forecast to increase by only 20 2.06 percent from '15 to '16. Would you again 21 accept that, subject to check? 22 MR. GRENEMAN: 23 A. Yes. 24 JOHNSON, Q.C.: 25 Q. Okay. And we see, again, a slight decrease</p>
<p>1 you a second to familiarize yourself with the 2 table. 3 MR. GRENEMAN: 4 A. Yes. 5 JOHNSON, Q.C.: 6 Q. Okay. 7 MR. GRENEMAN: 8 A. These are the energy? 9 JOHNSON, Q.C.: 10 Q. Yes, this is energy. 11 MR. GRENEMAN: 12 A. This is energy, yes. 13 JOHNSON, Q.C.: 14 Q. It's energy, yeah. Now Mr. Greneman, as you 15 can see, the Island Industrial Customer class 16 load increases fairly dramatically in 2016 and 17 2017 over the level seen in the 2015 test year 18 cost of service study. Would you agree with 19 that? 20 MR. GRENEMAN: 21 A. Yes. 22 JOHNSON, Q.C.: 23 Q. And you would be aware, I think -- I'll ask 24 you if you're aware that this dramatic 25 increase is driven by the ramping up of</p>	<p>1 for the Rural Customer class energy sales, but 2 I'm -- we've calculated that it's about a 3 decrease of .6 percent for the Rural 4 Customers, okay? 5 MR. GRENEMAN: 6 A. Yes. 7 JOHNSON, Q.C.: 8 Q. And then if we look at 2017, Mr. Greneman, 9 would you accept again, subject to check, that 10 the Island Industrial Customer class energy 11 sales are forecast to increase by 40.6 percent 12 over levels assumed in the 2015 test year? 13 MR. GRENEMAN: 14 A. Over 2015 did you say? 15 JOHNSON, Q.C.: 16 Q. Yes, sir, yes. 17 MR. GRENEMAN: 18 A. Or over 2016? 19 JOHNSON, Q.C.: 20 Q. Over 2015. 21 MR. GRENEMAN: 22 A. Subject to check. 23 JOHNSON, Q.C.: 24 Q. Yeah. Looks like it, okay. And again, 25 relative to 2015 to 2017, Newfoundland Power's</p>

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<p>1 energy sales are forecast to increase only 2.2 2 percent over 2015-2017. Would you again 3 accept that? 4 MR. GRENEMAN: 5 A. Yes, subject to check. 6 JOHNSON, Q.C.: 7 Q. Okay. So Mr. Greneman, would you agree that 8 the loads included in the 2015 test year cost 9 of service study do not reflect the load 10 forecast during the period that rates are 11 expected to be in effect here? 12 MR. GRENEMAN: 13 A. Not necessarily on an absolute basis, but the 14 load factor is reflective, as I understand it, 15 as it would be in future years. 16 JOHNSON, Q.C.: 17 Q. Could you explain? 18 MR. GRENEMAN: 19 A. I think that the load factor of Industrial 20 Customers and of Vale is appropriate -- is 21 reasonable, that is to say, it would be 22 reflective of what it might be in 2016 and 23 2017. 24 JOHNSON, Q.C.: 25 Q. Well, the -- would I be right in putting to</p>	<p>1 as you suggested, and NP grows as suggested 2 and Rural declines, as you suggested, that if 3 the demand rates were recalculated each year 4 2016 and 2017, there would only be a minor 5 difference in the per unit rate. 6 JOHNSON, Q.C.: 7 Q. So, would you nonetheless accept that Hydro is 8 filing a 2015 cost of service study with a 9 forecast that could be considered as tilted in 10 favour of the Island customers, Island 11 Industrial Customers, because it's ignoring 12 the ramping up of the load? 13 MR. GRENEMAN: 14 A. I'm sorry, can you say that again? 15 JOHNSON, Q.C.: 16 Q. Would you accept that the use of the load as 17 for the Industrial Customers, for instance, in 18 2015 over the next two years results in a 19 tilting in the favour of the Island Industrial 20 Customers because we're ignoring the ramping 21 up of the load? 22 MR. GRENEMAN: 23 A. I'm not sure of that. When load ramps up, it 24 drives up Holyrood fuel costs, which is shared 25 among all classes on load variation on energy</p>
<p>1 you the question that Hydro knows now that the 2 loads used in the 2015 cost of service study 3 do not reflect the loads that are expected 4 during the period up 'til the next GRA? 5 Because we see a ramping up in 2016 and 2017 6 relative to 2015. 7 MR. GRENEMAN: 8 A. Yes, and as load grows for Industrial 9 Customers in 2016 and 2017, so will the 10 revenues grow. 11 JOHNSON, Q.C.: 12 Q. Right, okay. 13 MR. GRENEMAN: 14 A. So there will be a match in that regard. 15 JOHNSON, Q.C.: 16 Q. Okay. So, if we -- if I asked if -- if I can 17 ask you how can rates in 2016 and 2017 be 18 considered just and reasonable when Hydro 19 knows now that they are not reflective of the 20 period when the rates are expected to be in 21 effect? 22 MR. GRENEMAN: 23 A. My understanding is that Hydro had done rough 24 calculation, a preliminary calculation which 25 shows that even though Industrial load grows,</p>	<p>1 basis, which is consistent with the cost of 2 service. So then IC would get a higher fuel 3 cost allocation than they would in the test 4 year. 5 JOHNSON, Q.C.: 6 Q. So if we -- instead of allocating costs 7 amongst customers using the 2015 forecast 8 load, if we used an average of the customer 9 class loads over the 2015 to 2017 time frame, 10 would that mean that the Industrial Customers 11 would be allocated more of the revenue 12 requirement in the cost of service study? 13 MR. GRENEMAN: 14 A. I think there would be just a minor change. 15 JOHNSON, Q.C.: 16 Q. But you would expect them to be allocated 17 more? Would that be correct? 18 MR. GRENEMAN: 19 A. In the cost of service studies? 20 JOHNSON, Q.C.: 21 Q. Right. 22 MR. GRENEMAN: 23 A. If the cost of service study were redone? 24 JOHNSON, Q.C.: 25 Q. Yes. I'm asking you if we, instead of</p>

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1 allocating costs using the 2015 forecast load,
 2 we use an average of the 2015 to 2017 time
 3 frame, would the ICs be allocated more of the
 4 revenue requirement than we're seeing
 5 presently?
 6 MR. GRENEMAN:
 7 A. On a demand basis, I would say a little bit,
 8 perhaps a little bit more, but on a all-in
 9 basis, demand, energy, changing -- if one had
 10 to change capacity factors, system load
 11 factors, I'm not sure how it would run out.
 12 JOHNSON, Q.C.:
 13 Q. Mr. Greneman, isn't it possible to modify
 14 allocators used in the 2015 test year to make
 15 them more consistent with the forecast loads
 16 that'll be in place from 2015 to 2017? Can't
 17 that be done, you know, without adjusting
 18 other aspects of the cost of service study?
 19 MR. GRENEMAN:
 20 A. I don't think it would be realistic or fair to
 21 only adjust one variable. Holyrood fuel costs
 22 would change. The capacity factor of Holyrood
 23 would change. System load factor would
 24 change. And then we would have to adjust NP
 25 and Rural as well. Is that correct?

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1 JOHNSON, Q.C.:
 2 Q. Well, so you're suggesting that it would not
 3 be possible to make a different allocation?
 4 We're not talking about changing revenue
 5 requirement. We're talking about just
 6 changing an allocation here, right?
 7 MR. GRENEMAN:
 8 A. I understand, but I'm not sure that it would
 9 be appropriate to only change one variable in
 10 the cost of service study.
 11 JOHNSON, Q.C.:
 12 Q. Do you recall the evidence of the Industrial
 13 Customers' expert witness, Mr. Patrick Bowman,
 14 from his original evidence filed in April
 15 2014? Do you recall what he -- him being
 16 concerned in his evidence about the fact that
 17 loads in the then 2013 test year did not
 18 reflect the higher typical load factor of the
 19 Industrial Customer class? Do you recall his
 20 report in that regard?
 21 MR. GRENEMAN:
 22 A. I would need to be directed to that.
 23 (10:30 a.m.)
 24 JOHNSON, Q.C.:
 25 Q. Okay. If we could bring up Mr. Bowman's April

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1 2014 report? And in particular, if we could
 2 bring up page three? Okay. Page three,
 3 paragraph 1.4. Paragraph 1.4 reads "the cost
 4 of service is heavily skewed by the
 5 representation of the transitional Industrial
 6 Customers, Vale and Praxair, who are not in
 7 similar circumstances to the IC group members.
 8 Outside of the fact that these customers are
 9 in commissioning phases, not operations, these
 10 customers have two defining features that are
 11 unique. One, their annual loads are not at a
 12 high load -- are not at high load factors, and
 13 two, the customers have unique contractual
 14 provisions approved by the PUB with regard to
 15 the demand charges during their commissioning
 16 phases. To properly reflect this in the cost
 17 of service in a manner that does not entirely
 18 neuter the Board's decisions regarding demand
 19 charges during the commissioning phases, the
 20 cost of service should be adjusted to
 21 normalize their annual loads along the lines
 22 shown in the response to IC-NLH-140." That's
 23 what I was referring to. So can you now
 24 recall that?
 25 MR. GRENEMAN:

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1 A. Is this Mr. Bowman's original?
 2 JOHNSON, Q.C.:
 3 Q. It is.
 4 MR. GRENEMAN:
 5 A. Well, I understand that he reversed it in his
 6 second.
 7 JOHNSON, Q.C.:
 8 Q. Yes, and what I'm getting to is to the point,
 9 Mr. Greneman, that would it be a fair
 10 characterization to say that Mr. Bowman was,
 11 similar to us, what we're seeking now, seeking
 12 some normalization of loads as they were going
 13 to be happening and as the Industrial
 14 Customers are moving out of this transitional
 15 phase or at least certain of them? Aren't we
 16 both on the same theme?
 17 MR. GRENEMAN:
 18 A. I'm not sure that we are because -- that is to
 19 say, I'm not sure that Mr. Bowman and you are
 20 on the same page because my recollection,
 21 subject to check, is if you look at Mr.
 22 Bowman's second evidence submission that he
 23 doesn't think there's an issue.
 24 JOHNSON, Q.C.:
 25 Q. Yes, but what I'm talking about now -- I'm

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1 fully aware that Mr. Bowman has filed -- Mr.
 2 Patrick Bowman has filed other evidence.
 3 MR. GRENEMAN:
 4 A. Yes.
 5 JOHNSON, Q.C.:
 6 Q. What I'm comparing to is what he was saying in
 7 April 2014 to what the Consumer Advocate is
 8 saying now as regards to trying to normalize
 9 the load.
 10 MR. GRENEMAN:
 11 A. My understanding is that what Mr. Bowman was
 12 discussing here, this passage, related to the
 13 fact that there was not a January peak which
 14 caused an issue, which is not the same
 15 situation that is in Hydro's filing.
 16 JOHNSON, Q.C.:
 17 Q. Well, could I turn you to an annunciation by
 18 Mr. Patrick Bowman at page 29, an annunciation
 19 of Mr. Bowman as to what he regards as one of
 20 the underlying principles behind cost of
 21 service analysis? Page 29 and bring you to
 22 lines three to six. Mr. Greneman, in this
 23 passage Mr. Patrick Bowman says "one of the
 24 underlying principles behind cost of service
 25 analysis is that it is never a precise tool

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1 for cost allocation. However, the analysis
 2 should reflect fair and reasonable estimation
 3 of the cost responsibility between customer
 4 classes for the periods in which the study is
 5 being applied." Okay.
 6 Would you agree with Mr. Bowman's
 7 statement that this is indeed one of the
 8 underlying principles behind cost of service
 9 analysis?
 10 MR. GRENEMAN:
 11 A. In general, yes.
 12 JOHNSON, Q.C.:
 13 Q. Okay. So given that this is indeed an
 14 accepted principle by Mr. Bowman, by yourself,
 15 do you believe that Hydro's 2015 test year
 16 loads, without modification, truly reflect a
 17 fair and reasonable estimation of the cost
 18 responsibility for energy and demand between
 19 customer groups for the period in which
 20 Hydro's cost of service study will be applied?
 21 MR. GRENEMAN:
 22 A. The projected loads for Vale and Praxair, I
 23 would suggest are not known with any certainty
 24 and there is perhaps some speculation in that.
 25 What I am suggesting is that if one were to

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1 redo the cost of service study to reflect the
 2 loads that you suggest for Vale and Praxair
 3 that it would not be a simple matter to do
 4 such -- it wouldn't be a simple matter to do a
 5 shortcut method. I mean, I don't think a
 6 shortcut method would be appropriate. I think
 7 it would involve redoing the entire cost of
 8 service study and I think if that were done
 9 that there would be a very, very small, if not
 10 negligible, difference.
 11 JOHNSON, Q.C.:
 12 Q. Okay. And have you seen and reviewed any
 13 analysis from Hydro as to what the difference
 14 would be in relation to demand and energy?
 15 MR. GRENEMAN:
 16 A. I believe that Hydro prepared, I'll say, a
 17 rough estimate of what the difference might be
 18 and I would need to confirm that with Hydro.
 19 I don't know if I'm speaking accurately or
 20 not.
 21 JOHNSON, Q.C.:
 22 Q. Okay.
 23 MR. GRENEMAN:
 24 A. But I think it's their estimation that the
 25 differences would be small.

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1 JOHNSON, Q.C.:
 2 Q. Okay. And perhaps we could ask -- because
 3 this will come up, no doubt, in the
 4 examination of Mr. Fagan as well, if we could
 5 ask for an undertaking from Hydro to provide
 6 its analysis in relation to that issue.
 7 MR. YOUNG:
 8 Q. Mr. Chair, I can check into that. We're in a
 9 little bit of a spot here because, as the
 10 witness has just indicated, he's not certain
 11 of its existence. He believes that it exists
 12 and I'm even less certain than Mr. Greneman.
 13 So I will look into that, yes.
 14 MS. GLYNN:
 15 Q. Noted on the record.
 16 JOHNSON, Q.C.:
 17 Q. Thank you. If I could direct your attention,
 18 Mr. Greneman, to IC-NLH-140?
 19 MS. GRAY:
 20 Q. Revision 1, Mr. Johnson?
 21 JOHNSON, Q.C.:
 22 Q. I'm sorry?
 23 MS. GRAY:
 24 Q. Revision 1?
 25 JOHNSON, Q.C.:

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<p>1 Q. No, the first one, 140. In this RFI, Mr. 2 Greneman, and this ties into what Mr. Patrick 3 Bowman had been stating in his original 4 evidence that we referred to a moment ago, the 5 Industrial Customers asked Hydro to provide a 6 revised cost of service study that maintains 7 the Vale and Praxair annual energy, but 8 normalizes the monthly peaks to reflect the 9 peak power on order level consistent with 2013 10 annual energy, more representative of a high 11 load factor Industrial Customer. And then we 12 note that Hydro refers to an attachment for 13 the cost of service study and Hydro says in 14 the answer "based on the 2013 test year annual 15 energy requirements for these two customers 16 and ignoring the monthly energy profile, a 17 'normalized' peak requirement for these 18 customers would be 4.9 megawatts compared with 19 the 19.6 megawatts used in the 2013 test 20 year." 21 Do you know or can you tell us, Mr. 22 Greneman, how Hydro went about normalizing the 23 peak in response to this RFI from the 24 Industrial Customers? And can you tell us 25 what the impact of that normalizing exercise</p>	<p>1 the determination of the overall revenue 2 requirement? 3 MR. GRENEMAN: 4 A. I do not know. 5 JOHNSON, Q.C.: 6 Q. You do not know, okay. If I could, Mr. 7 Greneman, perhaps try to make an illustration 8 of what we're driving at, in terms of why 9 changing an allocator is not necessarily the 10 end of the world as we see it, okay, and I'll 11 do it by bringing you to an illustration by a 12 discussion of a now settled item, being the 13 Holyrood capacity factor, for illustrative 14 purposes only. 15 You would be aware, Mr. Greneman, that in 16 determining the capacity factor for Holyrood, 17 the Board's approved cost of service 18 methodology calls for the use of a historical 19 five-year period, right? 20 MR. GRENEMAN: 21 A. Yes. 22 JOHNSON, Q.C.: 23 Q. Okay. And essentially, we take the average of 24 the annual Holyrood capacity factor over the 25 five-year period. Now Mr. Greneman, you'll be</p>
<p>1 was that the Industrials and Vale wished to 2 have? 3 MR. GRENEMAN: 4 A. I do not -- I am not familiar enough to speak 5 on that. 6 JOHNSON, Q.C.: 7 Q. I guess, Mr. Greneman, we would know however 8 that the result of that exercise would have 9 resulted in less cost being allocated to the 10 Industrial Customers than to Newfoundland 11 Power and the Island Rural Customers, correct? 12 MR. GRENEMAN: 13 A. I will accept that, subject to check. 14 JOHNSON, Q.C.: 15 Q. Yes, okay. Now by Hydro -- and Mr. Bowman 16 will -- my witness, Mr. Douglas Bowman, will 17 testify to these matters as well. But by 18 Hydro changing the cost allocation, it did not 19 require any changes in the determination of 20 the revenue requirement, did it? 21 MR. GRENEMAN: 22 A. Can you repeat that question? 23 JOHNSON, Q.C.: 24 Q. By Hydro changing the cost allocation, are you 25 aware that it didn't require any changes in</p>	<p>1 aware that in this instance that would result 2 in a Holyrood capacity factor of 24 percent 3 being used in the cost of service study, 4 right? 5 MR. GRENEMAN: 6 A. I believe I recall that number, yes. 7 JOHNSON, Q.C.: 8 Q. Okay. But we all know as we sit in this room 9 that Holyrood is forecast to operate at a 10 significantly higher capacity factor in 2015 11 and in -- than in 2015 itself actually. We 12 know that for a fact, right? 13 MR. GRENEMAN: 14 A. That is my understanding, yes. 15 JOHNSON, Q.C.: 16 Q. So, in fact, the capacity factor that we 17 expect for 2015 is actually 39 percent. Would 18 you take that, subject to check? 19 MR. GRENEMAN: 20 A. I would need to check it. 21 JOHNSON, Q.C.: 22 Q. Okay. If we could bring up Table 4.4 of the 23 Amended GRA for a moment? So this is from 24 Table 4.4 of Hydro's evidence and it purports 25 to show the Holyrood capacity factors in this</p>

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<p>1 table from 2001 to forecast year 2017. Okay?</p> <p>2 MR. GRENEMAN:</p> <p>3 A. Yes.</p> <p>4 JOHNSON, Q.C.:</p> <p>5 Q. Okay. So, you'll see that 2015, the capacity</p> <p>6 factor that's forecast is 39 percent, right?</p> <p>7 MR. GRENEMAN:</p> <p>8 A. Yes.</p> <p>9 JOHNSON, Q.C.:</p> <p>10 Q. Okay. And in 2016, it's forecast to be 45</p> <p>11 percent. So, would you agree, Mr. Greneman,</p> <p>12 that the use of the 24 percent Holyrood</p> <p>13 capacity factor, as per the Board's approved</p> <p>14 cost of service methodology, doesn't have</p> <p>15 anything to do with the determination of the</p> <p>16 revenue requirement per se?</p> <p>17 MR. GRENEMAN:</p> <p>18 A. Agreed.</p> <p>19 JOHNSON, Q.C.:</p> <p>20 Q. Agreed. It only has to do with how that</p> <p>21 revenue requirement is allocated amongst the</p> <p>22 customer classes, right?</p> <p>23 MR. GRENEMAN:</p> <p>24 A. No, it has to do with the way it's classified</p> <p>25 first, and then subsequently allocated.</p>	<p>1 JOHNSON, Q.C.:</p> <p>2 Q. Right. Is energy an allocator?</p> <p>3 (10:45 a.m.)</p> <p>4 MR. GRENEMAN:</p> <p>5 A. Sorry?</p> <p>6 JOHNSON, Q.C.:</p> <p>7 Q. Is energy an allocator as well?</p> <p>8 MR. GRENEMAN:</p> <p>9 A. Yes.</p> <p>10 JOHNSON, Q.C.:</p> <p>11 Q. Yeah. So if there were a single customer on</p> <p>12 the Island Interconnected System, i.e. let's</p> <p>13 assume only Newfoundland Power was on the</p> <p>14 Island Interconnected System, would you agree</p> <p>15 that there would be no need to come up with</p> <p>16 any of the allocators because the total</p> <p>17 revenue requirement would be paid by</p> <p>18 Newfoundland Power? Would that be right?</p> <p>19 MR. GRENEMAN:</p> <p>20 A. In that hypothetical example.</p> <p>21 JOHNSON, Q.C.:</p> <p>22 Q. Yeah, exactly.</p> <p>23 MR. GRENEMAN:</p> <p>24 A. Except in so far as it may affect allocations</p> <p>25 between systems, among systems.</p>
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<p>1 JOHNSON, Q.C.:</p> <p>2 Q. Right, okay. So a distinction without a</p> <p>3 difference, I guess, from my -- in terms of</p> <p>4 where I'm coming from. So Mr. Greneman, if we</p> <p>5 decided to change the Holyrood capacity factor</p> <p>6 in the test year from 24 percent to 50 percent</p> <p>7 for allocation purposes, we agree that this</p> <p>8 would not impact the overall revenue</p> <p>9 requirement?</p> <p>10 MR. GRENEMAN:</p> <p>11 A. Agreed.</p> <p>12 JOHNSON, Q.C.:</p> <p>13 Q. Okay. And Mr. Greneman, would you agree that</p> <p>14 there are a number of such allocators in the</p> <p>15 cost of service study that do not in fact</p> <p>16 change the revenue requirement calculation</p> <p>17 itself?</p> <p>18 MR. GRENEMAN:</p> <p>19 A. Yes.</p> <p>20 JOHNSON, Q.C.:</p> <p>21 Q. For instance, the use of coincident or</p> <p>22 coincident peak is an allocator?</p> <p>23 MR. GRENEMAN:</p> <p>24 A. Except to the extent that if load increases,</p> <p>25 fuel increases.</p>	<p>1 JOHNSON, Q.C.:</p> <p>2 Q. Okay, all right. But, so this -- I guess I</p> <p>3 put to you, Mr. Greneman, that we don't really</p> <p>4 have to go into the cost of service study to</p> <p>5 change production costs if we change the</p> <p>6 Holyrood capacity factor to be used for</p> <p>7 allocation purposes, correct?</p> <p>8 MR. GRENEMAN:</p> <p>9 A. For the Holyrood capacity factor, that's</p> <p>10 correct.</p> <p>11 JOHNSON, Q.C.:</p> <p>12 Q. That's correct, okay. I just want to turn to</p> <p>13 specifically assigned O&M for a moment. Could</p> <p>14 you explain -- and this is -- I don't know if</p> <p>15 it's as bad as depreciation, but you can see</p> <p>16 it from there, I suppose. Could you explain</p> <p>17 how Hydro currently goes about calculating</p> <p>18 specifically assigned O&M?</p> <p>19 MR. GRENEMAN:</p> <p>20 A. I am only going to do that at a high level and</p> <p>21 as far as the intricacies are concerned, and</p> <p>22 subject to correction by Mr. Fagan when he</p> <p>23 gets on, gross plant is -- original cost gross</p> <p>24 plant is functionalized and assigned,</p> <p>25 specifically assigned to customers and</p>

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1 operation and maintenance expenses, and I will
 2 say including administrative and general -- a
 3 lot of what I say needs to be confirmed as to
 4 the exact procedure and what's included by Mr.
 5 Fagan -- are apportioned on original cost
 6 gross plant.
 7 JOHNSON, Q.C.:
 8 Q. Okay. And I take it that this methodology is
 9 generally consistent with practice elsewhere?
 10 MR. GRENEMAN:
 11 A. Yes.
 12 JOHNSON, Q.C.:
 13 Q. Okay. And as you understand it, what method
 14 is being proposed by the witness for Vale, Mr.
 15 Mel Dean, for how this is supposed to be
 16 determined?
 17 MR. GRENEMAN:
 18 A. Mel Dean brings up the area of time value of
 19 money and he says that -- and this is
 20 paraphrasing, of course -- that newer
 21 facilities cost a lot more than older
 22 facilities, transmission plant, and by virtue
 23 of that higher cost attracts much higher
 24 operation and maintenance and administrative
 25 and general expenses, and by virtue of the

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1 particularly high transmission investment, the
 2 apportionment of O&M and A&G results in an
 3 inordinate amount to Vale.
 4 JOHNSON, Q.C.:
 5 Q. Okay. So that's in a nutshell that -
 6 MR. GRENEMAN:
 7 A. Pardon?
 8 JOHNSON, Q.C.:
 9 Q. That's in a nutshell and at a fairly high
 10 level and that's what I was really seeking to
 11 ask you.
 12 MR. GRENEMAN:
 13 A. I'm sorry?
 14 JOHNSON, Q.C.:
 15 Q. No, I'm -
 16 MR. GRENEMAN:
 17 A. I don't know if it's me or what.
 18 JOHNSON, Q.C.:
 19 Q. I'm terribly sorry. If that was a little
 20 longer, it'd be all right. But no, I guess,
 21 Mr. Greneman, I'm content with your answer.
 22 It was at a high level and just for the
 23 understanding of it.
 24 And again, I take it that you're, again,
 25 not aware of any jurisdiction that uses a

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1 methodology such as is proposed by Mr. Dean?
 2 MR. GRENEMAN:
 3 A. Not directly. This question was posed earlier
 4 to me. I have a feeling that in a fair value
 5 jurisdiction, of which there are maybe one or
 6 two in the United States, to the extent that
 7 plant and service is restated to current
 8 dollars that there might be an apportionment
 9 of O&M on that basis. I don't know at the
 10 moment. I do believe that where a situation
 11 may exist where using this methodology results
 12 in a very high, inordinately high O&M to a
 13 particular function or customer, that O&M
 14 could be handled by separate agreement or some
 15 other means, as opposed to apportioning it on
 16 gross plant.
 17 JOHNSON, Q.C.:
 18 Q. These fair value states, you say there's like
 19 a couple or two or three in the United States?
 20 MR. GRENEMAN:
 21 A. Indiana is one currently.
 22 JOHNSON, Q.C.:
 23 Q. Right.
 24 MR. GRENEMAN:
 25 A. Pennsylvania used to be one. I'm not sure if

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1 they still are. And I thought that New Mexico
 2 or one of those southwestern states may have
 3 been one.
 4 JOHNSON, Q.C.:
 5 Q. So is this a situation where the regulatory
 6 schemes statute says in this jurisdiction,
 7 we're a fair value jurisdiction, as opposed to
 8 -- is that how it works?
 9 MR. GRENEMAN:
 10 A. Yes. In Indiana, for example, which I am
 11 somewhat familiar with, you can restate rate
 12 base on, for example, current market value or
 13 I'll say trended cost, that is to say cost
 14 indexed up to current or some combination of
 15 the two, or you can actually come in with
 16 original cost. But the Indiana Utility
 17 Regulatory Commission will consider fair value
 18 if the utility presents it.
 19 JOHNSON, Q.C.:
 20 Q. But the rest of the 47 States, I take it from
 21 your answer, you wouldn't -
 22 MR. GRENEMAN:
 23 A. 49.
 24 JOHNSON, Q.C.:
 25 Q. No, I know, I meant -- no, no, I was aware

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<p>1 that there was 50, but the three and the 47, 2 but the other - 3 MR. GRENEMAN: 4 A. Minus those, yes. 5 JOHNSON, Q.C.: 6 Q. So the other 47, you wouldn't expect if you 7 were -- you wouldn't expect to be bringing 8 forward that type of analysis into the other 9 47 States, I take it? 10 MR. GRENEMAN: 11 A. No, that's correct. 12 JOHNSON, Q.C.: 13 Q. Right, okay. And Mr. Greneman, are you aware 14 as to whether Hydro has undertaken any studies 15 to compare the O&M costs of facilities that 16 are say from one to five years of age to the 17 O&M costs for facilities that are say five to 18 ten years of age or 15 to 20 years of age? 19 Any work like that been done to your 20 knowledge? 21 MR. GRENEMAN: 22 A. My understanding is that Hydro has made 23 efforts in that direction, but with respect to 24 how they were done, I would defer to Mr. 25 Fagan.</p>	<p>1 JOHNSON, Q.C.: 2 Q. Yes. You heard the part about Mr. Henderson 3 testifying to it, I hope? 4 MR. GRENEMAN: 5 A. I wasn't present, but I've heard you say that, 6 yes. 7 JOHNSON, Q.C.: 8 Q. Yes, okay. So he's testified that the bathtub 9 curve, it's basically a phenomenon whereby 10 facilities in their early years, they tend to 11 be less reliable, then they tend to be - 12 MR. GRENEMAN: 13 A. Did you say -- I'm sorry to interrupt. Did 14 you say less reliable? 15 JOHNSON, Q.C.: 16 Q. That's right. 17 MR. GRENEMAN: 18 A. Analogous to a high mortality curve, for 19 example? 20 JOHNSON, Q.C.: 21 Q. I suppose, yeah. When they're new, I guess 22 there's bugs to work out and then after a 23 while, you know, the bathtub, along the bottom 24 of the bathtub say, she's pretty flat and then 25 towards the end of -- as the asset ages, you</p>
<p>Page 82</p> <p>1 JOHNSON, Q.C.: 2 Q. Right, okay. Mr. Greneman, the Vice-President 3 of Hydro testified in this proceeding, Mr. 4 Henderson, and he testified that there is such 5 thing as a bathtub curve where facilities in 6 their early years -- and I'm paraphrasing, 7 okay, but they tend to be a bit less reliable 8 and then they tend to be more reliable during 9 the middle years and then they become less 10 reliable in later years. I take it you're 11 familiar with that bathtub? 12 MR. GRENEMAN: 13 A. I've heard the term and I had meant to ask 14 about it, but I didn't. 15 JOHNSON, Q.C.: 16 Q. Okay. 17 MR. GRENEMAN: 18 A. I've heard the term. 19 JOHNSON, Q.C.: 20 Q. All right. Given -- let us say that this 21 phenomenon is reliable out there, okay, and 22 it's well accepted and - 23 MR. GRENEMAN: 24 A. Can you just repeat the bathtub curve part 25 again?</p>	<p>Page 84</p> <p>1 come up the other side of the bathtub and you 2 got more issues. 3 CHAIRMAN: 4 Q. It's like life. 5 JOHNSON, Q.C.: 6 Q. That's what I'm talking about, okay, and given 7 what we've heard about this phenomenon, would 8 you expect, Mr. Greneman, that during the 9 early years, in fact the O&M costs for new 10 facilities might be higher than during the 11 middle years of the lives of these facilities? 12 MR. GRENEMAN: 13 A. I cannot say for a fact. What I can say is 14 that I'm familiar with mortality curves, the 15 I/O curves and I'm familiar with mass accounts 16 and I'm familiar with the high mortality in 17 dealing with mass accounts such as meters and 18 so on. As it pertains to a single 19 transmission line, I would have to -- I'm not 20 sure if it would agree with Mr. Henderson. Is 21 he speaking specifically about that, a single 22 transmission line? 23 JOHNSON, Q.C.: 24 Q. No, Mr. Henderson was speaking about the 25 principle of the bathtub curve.</p>

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<p>1 MR. GRENEMAN: 2 A. I'd say -- I would say I could agree with it 3 in restricted circumstances because it's 4 somewhat reflective of a mortality curve. 5 JOHNSON, Q.C.: 6 Q. Mr. Chairman, we're handy to 11, if we could 7 break now? 8 CHAIRMAN: 9 Q. Sure, thank you. 10 (BREAK - 10:58 a.m.) 11 (RESUME - 11:38 a.m.) 12 CHAIRMAN: 13 Q. I understand before we recommence or with the 14 -- Mr. Young, you have a matter you wish to 15 address? 16 MR. YOUNG: 17 Q. Ms. Pennell will address it. 18 CHAIRMAN: 19 Q. Or Ms. Pennell. 20 MR. YOUNG: 21 Q. Yes, thank you. 22 MS. PENNELL: 23 Q. Thank you, Mr. Chair. In light of the 24 settlement, our conversations with the 25 Consumer Advocate indicated that Undertaking</p>	<p>1 JOHNSON, Q.C.: 2 Q. Okay. 3 MR. GRENEMAN: 4 A. Thank you. 5 JOHNSON, Q.C.: 6 Q. Mr. Fagan can speak to this, I take it? 7 MR. GRENEMAN: 8 A. Pardon? 9 JOHNSON, Q.C.: 10 Q. He should be able to speak to that? 11 MR. GRENEMAN: 12 A. Yes. 13 JOHNSON, Q.C.: 14 Q. Thank you. Just finally then, on the topic of 15 the rural deficit, you've indicated, I think 16 it's a fair characterization, Mr. Greneman, 17 that given that the rural deficit is not 18 associated with the cost to supply the 19 customers who are required to pay for the 20 deficit that you believe that fairness becomes 21 the primary criteria for allocating the 22 deficit. Would that be correct? 23 MR. GRENEMAN: 24 A. Yes. 25 JOHNSON, Q.C.:</p>
<p>Page 86</p> <p>1 No. 39 can now be withdrawn. 2 CHAIRMAN: 3 Q. So we are back to you, sir, I think. 4 JOHNSON, Q.C.: 5 Q. Yes, thank you, Mr. Chairman. Two topics left 6 and they'll be pretty brief. The first topic 7 has to do with cost associated with the 8 purchasers from the Corner Brook co-generator 9 facility. Just a brief question on that 10 actually, Mr. Greneman. I take it these costs 11 associated with the purchases from the co- 12 generation facility are included in the cost 13 of service study? 14 MR. GRENEMAN: 15 A. Can you repeat the last part of the sentence? 16 JOHNSON, Q.C.: 17 Q. I understand that these costs are in fact 18 included in the cost of service study? 19 MR. GRENEMAN: 20 A. I understand they are. 21 JOHNSON, Q.C.: 22 Q. Okay. Can you just explain, Mr. Greneman, how 23 these costs are allocated to customers? 24 MR. GRENEMAN: 25 A. Can I defer this to Mr. Fagan?</p>	<p>Page 88</p> <p>1 Q. And is Mr. Brockman the only expert in this 2 proceeding who does not find Hydro's proposal 3 to be fair? 4 MR. GRENEMAN: 5 A. That is my understanding. 6 JOHNSON, Q.C.: 7 Q. And are you aware, Mr. Greneman, that the 8 Board's witness, Dr. Wilson, also supported 9 the allocation methodology as proposed by 10 Hydro in response to an RFI from the Consumer 11 Advocate? 12 MR. GRENEMAN: 13 A. Subject to check, I believe so. 14 JOHNSON, Q.C.: 15 Q. Yes, and just it's CA-PUB-001, if we could 16 bring that up? There it is. 17 MR. GRENEMAN: 18 A. Yes. 19 JOHNSON, Q.C.: 20 Q. Thank you. Mr. Greneman, I take it you also 21 would agree that the rural deficit allocation 22 issue can and should be dealt with at this 23 hearing? 24 MR. GRENEMAN: 25 A. I do.</p>

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1 JOHNSON, Q.C.:

2 Q. And are you aware as well, sir, that Dr.

3 Wilson stated that this issue can be

4 adequately dealt with at this hearing?

5 MR. GRENEMAN:

6 A. I believe so.

7 JOHNSON, Q.C.:

8 Q. Yeah, just for the record, it's CA-PUB-003. I

9 won't take you there. In fact, Mr. Greneman,

10 doesn't the Board really have to deal with

11 this issue in this hearing in the sense that

12 if it doesn't approve Hydro's proposed

13 allocation methodology, it will need to

14 address the issue of the proposed 27.8 percent

15 rate increase for the Labrador Interconnected

16 Rural Customers? Is that right?

17 MR. GRENEMAN:

18 A. Can you repeat that question, please?

19 JOHNSON, Q.C.:

20 Q. In fact, what I asked you, Mr. Greneman, was

21 as a practical matter, doesn't the Board have

22 to deal with this issue in this hearing in the

23 sense that if it does not approve Hydro's

24 proposed allocation methodology, it will need

25 to address the issue of the proposed 27.8

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1 percent rate increase for the Labrador

2 Interconnected customers?

3 MR. GRENEMAN:

4 A. I believe so.

5 JOHNSON, Q.C.:

6 Q. Finally on -- I won't say finally. It's so

7 final. Is there a cost of service or rate

8 design element associated with the rural

9 deficit allocation other than fairness?

10 MR. GRENEMAN:

11 A. Not per se.

12 JOHNSON, Q.C.:

13 Q. Would it be fair to say that the current

14 methodology which would result in Labrador

15 Interconnected customers paying 142 percent of

16 costs results in a less efficient price signal

17 than the proposed methodology which results in

18 both Labrador Interconnected and Newfoundland

19 Power customers paying 113 percent of costs?

20 Would you comment on that?

21 MR. GRENEMAN:

22 A. I heard the question, I just need you to say

23 it one more time so I can -

24 JOHNSON, Q.C.:

25 Q. Okay. Is it fair to say that the current

Page 91

1 methodology which would result in Labrador

2 Interconnected customers paying 142 percent of

3 costs results in a less efficient price signal

4 than the proposed methodology which results in

5 both Labrador Interconnected and Newfoundland

6 Power customers paying 113 percent of costs?

7 MR. GRENEMAN:

8 A. I wholly agree.

9 JOHNSON, Q.C.:

10 Q. And could you explain why you would wholly

11 agree?

12 (11:45 a.m.)

13 MR. GRENEMAN:

14 A. Because the current methodology, to the extent

15 that it -- it presents a skewed price signal

16 to Labrador customers and a different price

17 signal to Island Interconnected customers.

18 The revenue allocation method is more, in a

19 sense, a neutral price signal to both.

20 JOHNSON, Q.C.:

21 Q. And what makes the price signal skewed and

22 what's the problem with there being a skewed

23 price signal?

24 MR. GRENEMAN:

25 A. The fact that it is an overhead, if you will,

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1 on Labrador Interconnected customers has a

2 component of cost, that is to say the rural

3 deficit, which is not reflective of Labrador's

4 internal cost, and that makes it skewed.

5 JOHNSON, Q.C.:

6 Q. And what makes it a less efficient price

7 signal?

8 MR. GRENEMAN:

9 A. It's not representative.

10 JOHNSON, Q.C.:

11 Q. Of the costs?

12 MR. GRENEMAN:

13 A. Of the cost to serve Labrador.

14 JOHNSON, Q.C.:

15 Q. Okay.

16 MR. GRENEMAN:

17 A. There is a component that is not reflective of

18 the cost to serve Labrador customers.

19 JOHNSON, Q.C.:

20 Q. Just generally, Mr. Greneman, this is a

21 question that I put to Mr. Henderson when he

22 was testifying and the question is: does the

23 rural deficit result in rates that are just

24 and reasonable in your view? And that gets

25 allocated to customers, whether it's 113

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1 percent in the case of Newfoundland Power, 142
 2 percent in the case of Labrador
 3 Interconnected. Could you comment on -
 4 MR. GRENEMAN:
 5 A. Under the current methodology, I would say
 6 that it results in rates that are not
 7 necessarily just and reasonable.
 8 JOHNSON, Q.C.:
 9 Q. And if we then assume the application of the
 10 proposed methodology so that both Island
 11 Interconnected customers and Labrador
 12 Interconnected customers are paying 113
 13 percent of their cost, by reason of their
 14 picking up the burden of the rural deficit,
 15 would you comment on that scenario from the
 16 standpoint of the rates being just and
 17 reasonable?
 18 MR. GRENEMAN:
 19 A. Can you -- I'd like the first part of the
 20 question, if you can rephrase, restate the
 21 whole question?
 22 JOHNSON, Q.C.:
 23 Q. If we look at the scenario whereby Hydro's
 24 proposed allocation methodology, okay, let's
 25 assume that it's accepted and let's assume

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1 that thenceforth Newfoundland Power customers
 2 and Labrador Interconnected customers rates
 3 are 113 percent of costs, okay?
 4 MR. GRENEMAN:
 5 A. Yes.
 6 JOHNSON, Q.C.:
 7 Q. Could I get you to comment on your view of the
 8 reasonableness and justness of the rates in
 9 that scenario?
 10 MR. GRENEMAN:
 11 A. The component -- in this scenario, the
 12 component, the rural deficit component, is the
 13 same proportion in each jurisdiction and
 14 therefore it gives a proportionally similar
 15 price signal in relation to the underlying
 16 cost to serve that are applicable to customers
 17 in each system.
 18 JOHNSON, Q.C.:
 19 Q. Let me go at it another way. Let us say that
 20 the Labrador Interconnected issue is not what
 21 we're talking about and all we're talking
 22 about is the scenario whereby Newfoundland
 23 Power customers are paying 113 percent of
 24 costs.
 25 MR. GRENEMAN:

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1 A. Yes.
 2 JOHNSON, Q.C.:
 3 Q. Could I get you to comment on the
 4 reasonableness and justness of the rates to
 5 Newfoundland Power in that scenario?
 6 MR. GRENEMAN:
 7 A. Insofar as price signal is concerned?
 8 JOHNSON, Q.C.:
 9 Q. Well, insofar as what do you think about the
 10 reasonableness and justness of the rate which
 11 is 113 percent of costs?
 12 MR. GRENEMAN:
 13 A. And may I ask if only Newfoundland Power would
 14 be the recipient of this, under this scenario?
 15 JOHNSON, Q.C.:
 16 Q. Yes, you can assume that.
 17 MR. GRENEMAN:
 18 A. The 113 percent, factor of 1.13, you will --
 19 would presumably be applied to all rate
 20 structure components and insofar as the
 21 Commission says this is what needs to be done,
 22 I think it's reasonable.
 23 JOHNSON, Q.C.:
 24 Q. Mr. Greneman, the rural deficit has reached an
 25 amount of around 64 million dollars on an

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1 annual basis. I think that's the figure in
 2 2015. Is that a figure that you're familiar
 3 with?
 4 MR. GRENEMAN:
 5 A. I've seen that number I believe.
 6 JOHNSON, Q.C.:
 7 Q. Okay. And would you regard the allocation of
 8 that amount of money to customers who are not
 9 causing that deficit to arise, would you
 10 regard that as a significant burden on the
 11 subsidizing customers?
 12 MR. GRENEMAN:
 13 A. In relation to what number?
 14 JOHNSON, Q.C.:
 15 Q. In relation to 100 percent of their own costs.
 16 MR. GRENEMAN:
 17 A. And what is the magnitude of that number?
 18 JOHNSON, Q.C.:
 19 Q. It's a scenario where -- presently, for
 20 instance, in a Newfoundland Power customer,
 21 okay, is paying 13 percent more than their
 22 costs. They're paying 113 percent of costs.
 23 MR. GRENEMAN:
 24 A. It is a burden.
 25 JOHNSON, Q.C.:

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1 Q. Yeah. But you would not regard it as being an
 2 unjust and unreasonable rate? Or I want to be
 3 clear on what you would regard it as being.
 4 MR. GRENEMAN:
 5 A. I don't think I'm prepared to answer that
 6 right now. I need to get that -
 7 JOHNSON, Q.C.:
 8 Q. You haven't thought about the question?
 9 MR. GRENEMAN:
 10 A. I need to give it more thought.
 11 JOHNSON, Q.C.:
 12 Q. You'd have to give it more thought?
 13 MR. GRENEMAN:
 14 A. Yes.
 15 JOHNSON, Q.C.:
 16 Q. Mr. Greneman, do you think that the amount --
 17 should the amount of a customer's bill that is
 18 associated with the rural deficit subsidy
 19 should be identified on customer's bills?
 20 MR. GRENEMAN:
 21 A. Not necessarily.
 22 JOHNSON, Q.C.:
 23 Q. Okay. Could you explain?
 24 MR. GRENEMAN:
 25 A. I'm just not sure if it's an appropriate

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1 policy to do so.
 2 JOHNSON, Q.C.:
 3 Q. What gives you the pause?
 4 MR. GRENEMAN:
 5 A. It's a -- I think it would be a sensitive
 6 matter to consumers. I'm not sure that's
 7 something that needs to be highlighted.
 8 JOHNSON, Q.C.:
 9 Q. Would it assist -- I take it you would agree
 10 that it would assist in the transparency of
 11 the subsidy?
 12 MR. GRENEMAN:
 13 A. I did mention that, yes.
 14 JOHNSON, Q.C.:
 15 Q. Yes, okay. And what would be the downside
 16 specifically as you would see it from having
 17 it on customers' bills?
 18 MR. GRENEMAN:
 19 A. I'm sorry, the downside of what?
 20 JOHNSON, Q.C.:
 21 Q. Of it being on customers' bills, identified
 22 on.
 23 MR. GRENEMAN:
 24 A. If I could analogize, in many, many
 25 jurisdictions, there are cross subsidies among

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1 customer classes which in a sense are similar
 2 to the rural deficit and in no jurisdiction
 3 that I've ever seen has that increment of
 4 cross subsidy ever been identified on a
 5 customer bill and nor do I think it's
 6 appropriate to do so.
 7 JOHNSON, Q.C.:
 8 Q. Would they be situations that are truly
 9 analogous to our rural deficit situation here
 10 though?
 11 MR. GRENEMAN:
 12 A. It's not 100 percent analogous, but it's
 13 analogous to the extent that there is, either
 14 by design or not by design, in many, many
 15 utilities in many, many jurisdictions, cross
 16 subsidies that do exist and they're never
 17 highlighted on a customer bill.
 18 JOHNSON, Q.C.:
 19 Q. By subsidies in that context, are you talking
 20 about a situation where say the general
 21 customer class might be paying at the higher
 22 end of a band whereas another customer group,
 23 say residential, might be paying at the mid or
 24 lower part of an approved band? Is that what
 25 you're referring to?

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1 MR. GRENEMAN:
 2 A. It is.
 3 JOHNSON, Q.C.:
 4 Q. And what would make you think that that would
 5 be analogous to a situation such as we have
 6 with the rural deficit? Because that's a cost
 7 that these customers who are subsidizing have
 8 nothing to do with.
 9 MR. GRENEMAN:
 10 A. Well, it's analogous insofar as if general
 11 service is providing a subsidy to residential,
 12 general service had nothing to do with the
 13 shortfall of residential.
 14 JOHNSON, Q.C.:
 15 Q. Can you think of another jurisdiction where
 16 the level of subsidy, the annual quantum is so
 17 high relative to the numbers who are bearing
 18 it?
 19 MR. GRENEMAN:
 20 A. I can. I performed a comprehensive cost of
 21 service study for Northern Indiana Public
 22 Service Company, otherwise known as NIPSCO.
 23 NIPSCO had a rate case in 1983. The rates
 24 that went into effect - as a result, went into
 25 effect in 1985. NIPSCO has a very, very large

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1 industrial customer base that serves the
 2 Northern third of the State of Indiana. From
 3 1985 until approximately 2007, NIPSCO had not
 4 had a rate case, but the industrial customers
 5 kept pushing for lower rates for competitive
 6 reasons. In 1987, the rate case revenue
 7 requirement required that industrial customers
 8 doubled their rates from what they were paying
 9 prior to the rate case. So I don't know the
 10 dollar amount, but it's quite a large - it's a
 11 very large dollar amount, and in terms of
 12 percent it far exceeds the rural deficit. The
 13 difference was picked up primarily by
 14 residential and commercial customer growth.
 15 JOHNSON, Q.C.:
 16 Q. And in that Indiana situation, was that the
 17 product of any State of Indiana direction or
 18 was that part of the rate making process?
 19 MR. GRENEMAN:
 20 A. I'm sorry, I didn't get the first part.
 21 JOHNSON, Q.C.:
 22 Q. The situation in Indiana and how the deficit
 23 would be shared, is that the product of state
 24 law in that case, or is it a matter of
 25 regulatory judgment, how the deficit got

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1 allocated?
 2 MR. GRENEMAN:
 3 A. I understand there was a phase in, in a sense.
 4 Are you referring to at the conclusion of the
 5 rate case?
 6 JOHNSON, Q.C.:
 7 Q. No, I'm referring to, as we've discussed
 8 earlier, the industrial customers, for
 9 instance, by law are excused from the
 10 responsibility for contributing to the
 11 subsidy, right?
 12 MR. GRENEMAN:
 13 A. Yes.
 14 JOHNSON, Q.C.:
 15 Q. And so what I'm getting at is were there State
 16 laws of Indiana influencing how the subsidies
 17 burden got shared, or was it a matter of the
 18 rate making application?
 19 (12:00 p.m.)
 20 MR. GRENEMAN:
 21 A. Well, I think, in general, it was the ability
 22 of which classes could absorb the difference.
 23 Competitive reasons, competitive concerns
 24 factors are one reason why, for example,
 25 industrial rates might be lower in certain

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1 jurisdictions and for certain customers.
 2 JOHNSON, Q.C.:
 3 Q. Thank you very much, Mr. Greneman.
 4 MR. GRENEMAN:
 5 A. Thank you.
 6 CHAIR:
 7 Q. I think you're next, Mr. Coxworthy.
 8 MR. COXWORTHY:
 9 Q. Thank you, Mr. Chair.
 10 MR. ROBERT GRENEMAN - CROSS-EXAMINATION BY MR. PAUL
 11 COXWORTHY:
 12 MR. COXWORTHY:
 13 Q. Mr. Greneman, Paul Coxworthy, my colleague,
 14 Dean Porter, represent the island industrial
 15 customer group.
 16 MR. GRENEMAN:
 17 A. How do you do?
 18 MR. COXWORTHY:
 19 Q. Thank you. Mr. Greneman, I'd like to refer
 20 you back to some evidence you gave this
 21 morning, I believe, to Mr. O'Brien, in
 22 relation to the rural deficit allocation, not
 23 because the industrial customers, as the
 24 Consumer Advocate has just pointed out, have a
 25 direct interest, but I was interested in your

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1 listing of the factors that would go into,
 2 I'll use the word "reasonableness", it may not
 3 be the word you used, but to determine what
 4 the reasonableness of the rural deficit
 5 allocation is, and if reasonableness is not
 6 the right word, you'll correct me, but the
 7 factors that I listed, you were asked what
 8 other than costs would go into assessing the
 9 reasonableness of the rural deficit
 10 allocation, and I understood your answer to be
 11 you listed a number of factors;
 12 understandability, administrative ease of
 13 application, and stability as the customer
 14 load profiles changes and market situation
 15 changes?
 16 MR. GRENEMAN:
 17 A. Yes.
 18 MR. COXWORTHY:
 19 Q. So I'm not inadvertently, I might add,
 20 mischaracterizing your evidence?
 21 MR. GRENEMAN:
 22 A. I think, in general, that's right.
 23 MR. COXWORTHY:
 24 Q. Thank you, and with respect to stability as to
 25 customer load profiles changes and market

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1 situations, is that a factor that's unique to
 2 rural customers or would that be a concern for
 3 retail customers, for industrial customers as
 4 well?
 5 MR. GRENEMAN:
 6 A. I think, in general, it's applicable to all
 7 customer classes.
 8 MR. COXWORTHY:
 9 Q. And the concern for stability, rate stability,
 10 rate predictability, is that a - we've been
 11 talking about fairness. You've been asked
 12 many questions about fairness, and is that a
 13 component of fairness in the making of rates
 14 whether there is rate stability, rate
 15 predictability, or is it a separate thing when
 16 one thinks about rate making principles?
 17 MR. GRENEMAN:
 18 A. Well, fairness in a sense is subjective, so I
 19 did list one of the items as perception of
 20 fairness.
 21 MR. COXWORTHY:
 22 Q. So perception of fairness would be - rate
 23 stability and rate predictability, is that an
 24 aspect of just a perception of fairness?
 25 MR. GRENEMAN:

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1 A. Well, the application, in a sense, is - I have
 2 to be careful what I say, equal to all
 3 parties, but in a sense evenly applied to all
 4 parties.
 5 MR. COXWORTHY:
 6 Q. Are there some objective measures for rate
 7 stability, rate predictability?
 8 MR. GRENEMAN:
 9 A. I don't know - are there measures for it?
 10 Well, I mean, as conditions change, how do
 11 rates change, and that measure could be a
 12 measure of rate stability.
 13 MR. COXWORTHY:
 14 Q. And rate predictability?
 15 MR. GRENEMAN:
 16 A. And rate what?
 17 MR. COXWORTHY:
 18 Q. Predictability?
 19 MR. GRENEMAN:
 20 A. Predictability, yes. More so stability, less
 21 so predictability.
 22 MR. COXWORTHY:
 23 Q. Thank you. Mr. Greneman, you were asked some
 24 questions with respect to the O & M treatment
 25 or component in specifically assigned charges,

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1 and you were directed to the rebuttal evidence
 2 that I believe was filed on May 30th, 2014.
 3 Would it be possible to bring that up on the
 4 screen, and to Section 2.0, which is - thank
 5 you, Ms. Gray. At pages 14 and 15 of that
 6 section - it wasn't that far down, and I may
 7 have written the page reference incorrectly.
 8 MS. GRAY:
 9 Q. Line?
 10 MR. COXWORTHY:
 11 Q. It might have been line 14 and 15, thank you,
 12 Ms. Gray. If you could scroll down, please,
 13 I'm trying to find - there is a section there,
 14 and, unfortunately, my reference is not taking
 15 us to it. Yes, it is, it's 2.2, thank you, so
 16 it was on the next page. There's reference
 17 there, "One alternative solution can be to
 18 develop an O & M allocation where specifically
 19 assigned plant additions subsequent to the
 20 2007 GRA are de-escalated back to a date in
 21 the 2007 GRA test year", and that alternative
 22 solution, is that an alternative to what Mr.
 23 Dean is proposing?
 24 MR. GRENEMAN:
 25 A. I think I had a similar question earlier.

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1 MR. COXWORTHY:
 2 Q. Yes, absolutely.
 3 MR. GRENEMAN:
 4 A. It's only - this is not intended to be a final
 5 solution. It's just like a very simple, if
 6 you will, back trending, not intended to be
 7 anything final, simply to open the door for
 8 discussion. I understand that restating all
 9 plant in current dollars could be a
 10 significant undertaking.
 11 MR. COXWORTHY:
 12 Q. And you spoke to the merits of a more
 13 comprehensive analysis. You answered some
 14 questions about that. What are the merits of
 15 the alternative solution, as opposed to, as
 16 you characterize it, a final solution? What
 17 would be the merits in this general rate
 18 application, for instance, of implementing
 19 instead an alternative solution, such as the
 20 one that you're outlining in that evidence
 21 there?
 22 MR. GRENEMAN:
 23 A. Well, I don't believe it does far enough.
 24 It's just sort of like a first step.
 25 MR. COXWORTHY:

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<p>1 Q. Why would one start with the first step and</p> <p>2 perhaps stop for some period of time at a</p> <p>3 first step?</p> <p>4 MR. GRENEMAN:</p> <p>5 A. It's something you can do in five minutes on</p> <p>6 back of the envelope more or less.</p> <p>7 MR. COXWORTHY:</p> <p>8 Q. So nothing more than that in terms of when you</p> <p>9 talk about an alternative solution?</p> <p>10 MR. GRENEMAN:</p> <p>11 A. No, nothing more than that.</p> <p>12 MR. COXWORTHY:</p> <p>13 Q. Thank you, Mr. Greneman.</p> <p>14 MR. GRENEMAN:</p> <p>15 A. I don't like it.</p> <p>16 MR. COXWORTHY:</p> <p>17 Q. Mr. Greneman, I have no further questions for</p> <p>18 you. Thank you.</p> <p>19 CHAIRMAN:</p> <p>20 Q. Mr. O'Reilly, sir.</p> <p>21 MR. ROBERT GRENEMAN - CROSS-EXAMINATION BY O'REILLY,</p> <p>22 Q.C.:</p> <p>23 O'REILLY, Q.C.:</p> <p>24 Q. Thank you, Mr. Chairman. Good afternoon, Mr.</p> <p>25 Greneman. Can you hear me?</p>	<p>1 A. Yes, it is.</p> <p>2 O'REILLY, Q.C.:</p> <p>3 Q. And I want to take you to - you also, of</p> <p>4 course, have seen Mr. Dean's - his evidence as</p> <p>5 well, his pre-filed evidence?</p> <p>6 MR. GRENEMAN:</p> <p>7 A. I have.</p> <p>8 O'REILLY, Q.C.:</p> <p>9 Q. Okay. I want to take you to - I wonder can we</p> <p>10 bring up Vale 083, Revision 1. Are you</p> <p>11 familiar with this document, Mr. Greneman?</p> <p>12 MR. GRENEMAN:</p> <p>13 A. I would like to read it, if I can.</p> <p>14 O'REILLY, Q.C.:</p> <p>15 Q. Yes.</p> <p>16 MR. GRENEMAN:</p> <p>17 A. Can you page down a little bit lower.</p> <p>18 MS. GLYNN:</p> <p>19 Q. Mr. Greneman, the paper copy of the RFI is</p> <p>20 behind you as well.</p> <p>21 MR. GRENEMAN:</p> <p>22 A. Thank you. Yes, I'm familiar with it.</p> <p>23 O'REILLY, Q.C.:</p> <p>24 Q. You're familiar with it.</p> <p>25 MR. GRENEMAN:</p>
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<p>1 MR. GRENEMAN:</p> <p>2 A. I can.</p> <p>3 O'REILLY, Q.C.:</p> <p>4 Q. My name is Tom O'Reilly, and with me is Mr.</p> <p>5 Denis Fleming. We represent the interest of</p> <p>6 Vale Newfoundland in this general rate</p> <p>7 hearing.</p> <p>8 MR. GRENEMAN:</p> <p>9 A. Uh-hm.</p> <p>10 O'REILLY, Q.C.:</p> <p>11 Q. I'm not going to go back over much of what has</p> <p>12 already been discussed about the O & M</p> <p>13 allocation as specifically assigned charge.</p> <p>14 This is a particular interest of Vale in this</p> <p>15 particular - where we are today. I take it</p> <p>16 that from your rebuttal evidence, that you</p> <p>17 recognize that there is potential for inequity</p> <p>18 in the present methodology applied by Hydro in</p> <p>19 calculating the O & M charge for specific</p> <p>20 customers?</p> <p>21 MR. GRENEMAN:</p> <p>22 A. I do.</p> <p>23 O'REILLY, Q.C.:</p> <p>24 Q. Is that correct?</p> <p>25 MR. GRENEMAN:</p>	<p>1 A. Yes.</p> <p>2 O'REILLY, Q.C.:</p> <p>3 Q. Are you in agreement with Hydro's approach to</p> <p>4 this issue as outlined in its response to that</p> <p>5 RFI?</p> <p>6 MR. GRENEMAN:</p> <p>7 A. Yes.</p> <p>8 O'REILLY, Q.C.:</p> <p>9 Q. Pardon me?</p> <p>10 MR. GRENEMAN:</p> <p>11 A. Yes, I am.</p> <p>12 O'REILLY, Q.C.:</p> <p>13 Q. Okay, thank you. The other question I have is</p> <p>14 more to get clarification on something that</p> <p>15 was raised by Mr. Johnson this morning. He</p> <p>16 talked about this bathtub curve, which I think</p> <p>17 you said you heard about, but you're not</p> <p>18 overly familiar with the expression. You've</p> <p>19 heard of it?</p> <p>20 MR. GRENEMAN:</p> <p>21 A. Yes, and I'm a little bit more familiar with</p> <p>22 it now than I was when Mr. Johnson asked me.</p> <p>23 O'REILLY, Q.C.:</p> <p>24 Q. Yeah. As I understood, the concept is that -</p> <p>25 and the initial stages of asset use, and I'm</p>

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<p>1 talking in the utility field, there is an 2 initial period of time where the O & M costs 3 are high, then they become stable, and then as 4 they age, they get higher again, and I thought 5 in response to him you said that that may be 6 true of mass assets? 7 MR. GRENEMAN: 8 A. Yes. 9 O'REILLY, Q.C.: 10 Q. But not necessarily reflective of cost with 11 respect to a particular asset, for example, a 12 transmission line, towers, and so on, is that 13 - did I understand your evidence correctly? 14 MR. GRENEMAN: 15 A. Exactly, yes. 16 O'REILLY, Q.C.: 17 Q. Okay. I think that's all I have. Thank you, 18 Mr. Greneman. 19 MR. GRENEMAN: 20 A. Thank you. 21 CHAIRMAN: 22 Q. Okay, Mr. Luk, do you have any - 23 MR. LUK: 24 Q. Yes, Mr. Chair, thank you. 25 MR. ROBERT GRENEMAN - CROSS-EXAMINATION BY MR. SENWUNG</p>	<p>1 A. I did not produce them, and I think perhaps - 2 I'm not sure if Mr. Fagan is the more 3 appropriate witness to ask this to or not. 4 MR. LUK: 5 Q. Is this not part of the cost of service? 6 MR. GRENEMAN: 7 A. It is. I did not personally produce these 8 numbers, though. 9 MR. LUK: 10 Q. Okay. Well, perhaps you might be familiar 11 with the general - 12 MR. GRENEMAN: 13 A. Okay, sure. 14 MR. LUK: 15 Q. Causes of the changes in cost of service, in 16 any event, so maybe you can try this question. 17 MR. GRENEMAN: 18 A. Okay, sure. 19 MR. LUK: 20 Q. But if you don't have the information - 21 MR. GRENEMAN: 22 A. Sure. 23 MR. LUK: 24 Q. So I note that at line 23 under column 7, the 25 Labrador Interconnected return on rate base</p>
<p>Page 114</p> <p>1 LUK: 2 MR. LUK: 3 Q. My name is Senwung Luk. I'm counsel to Innu 4 Nation at this proceeding. Good afternoon. 5 MR. GRENEMAN: 6 A. Good morning. 7 MR. LUK: 8 Q. We just have two main topics we want to cover 9 in this cross-examination. The first is with 10 respect to - Ms. Gray, if you could pull up 11 Volume 2, Schedule 1.1. 12 MS. GRAY: 13 Q. Volume 2 Exhibit, Mr. Luk? 14 MR. LUK: 15 Q. Exhibit - the cost of service exhibit. Scroll 16 down to Page 2. My question is about the 17 return on rate base, and I assume you're 18 familiar with these numbers in this exhibit? 19 MR. GRENEMAN: 20 A. I'm sorry, did you say you assume I'm familiar 21 with what? 22 MR. LUK: 23 Q. The numbers in this exhibit and how they were 24 prepared? 25 MR. GRENEMAN:</p>	<p>Page 116</p> <p>1 cost is around 6.3 million. 2 MR. GRENEMAN: 3 A. Line 23. 4 MR. LUK: 5 Q. Sorry, this is - at line 23. 6 MR. GRENEMAN: 7 A. Yes. 8 MR. LUK: 9 Q. It's about 6.3 million for Labrador 10 Interconnected? 11 MR. GRENEMAN: 12 A. Yes. 13 (12:15 a.m.) 14 MR. LUK: 15 Q. And Ms. Gray, could you pull up CA-NLH-090, 16 the original unrevised version, and Page 2, so 17 that would be lines 21 and 22. I think - can 18 you just scroll up a little bit so I can see 19 the column. So at the 2007 test year, again 20 this would be for Labrador Interconnected, the 21 return on debt which would be line 21, and the 22 return on equity, that adds up to the return 23 on rate base, is that right? 24 MR. GRENEMAN: 25 A. 14.164 million?</p>

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<p>1 MR. LUK: 2 Q. Well - 3 MR. GRENEMAN: 4 A. No, no, I'm sorry, you have to go down. 5 MR. LUK: 6 Q. It would be just - it would be line 21 plus 7 22. I don't think we have a separated line 8 item for the return on rate base in this set 9 of numbers, it seems, but I took the liberty 10 of adding that up and I think that adds up to 11 \$3,459,597.00? 12 MR. GRENEMAN: 13 A. Yes. 14 MR. LUK: 15 Q. So between the 2007 test year and the 2015 16 test year, it looks like that number, the 17 return on rate base number for Labrador 18 Interconnected has gone up from 3.5 million to 19 6.3 million? 20 MR. GRENEMAN: 21 A. May I see the heading on this particular 22 schedule again? Here it shows 2013 test year 23 and it doesn't show the previous number or 24 anything - what it does show is 5.7 million 25 and change.</p>	<p>1 undertaking. 2 MR. LUK: 3 Q. Thank you. The second set of questions has to 4 do with rural deficit. I think in your 5 testimony this morning, you talked about the 6 different factors that are important to 7 consider in determining a rural deficit 8 allocation method, and I have written down 9 transparency, ease of application, and 10 stability, and I assume those are in addition 11 to fairness, is that right? 12 MR. GRENEMAN: 13 A. Yes. 14 MR. LUK: 15 Q. Is that exhaustive of the factors? 16 MR. GRENEMAN: 17 A. No, it's just some factors - considerations I 18 pencilled in. I would not say it's an 19 exhaustive list. 20 MR. LUK: 21 Q. Is there a place in Hydro's evidence where 22 there's an exhaustive list of factors that are 23 set out in what Hydro has considered in 24 formulating the rural deficit allocation 25 method?</p>
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<p>1 MR. LUK: 2 Q. Yes, it seems like by about 2015 test year to 3 have gone up to 6.3 million. 4 MR. GRENEMAN: 5 A. Okay. 6 MR. LUK: 7 Q. As Exhibit 13 seems to show. 8 MR. GRENEMAN: 9 A. I see that difference. 10 MR. LUK: 11 Q. And I think my math is not great, but I think 12 that adds up to an 81 percent increase in 13 cost. Do you know how much of that increase 14 can be attributed to the Labrador City 15 distribution upgrade? 16 MR. GRENEMAN: 17 A. You would really be able to take that up with 18 Mr. Fagan. 19 MR. LUK: 20 Q. Is that something that Hydro would be prepared 21 to undertake to answer? 22 MR. YOUNG: 23 Q. I think we could look into that, yes. 24 MS. GLYNN: 25 Q. We'll note that on the record as an</p>	<p>1 MR. GRENEMAN: 2 A. My recollection is, I don't recall seeing one, 3 but there might be statements of encompassing 4 factors that might be added to this. 5 MR. LUK: 6 Q. I recall that this morning you said that 7 between the revenue requirement method and the 8 number of customers method, that you thought 9 that the revenue requirement method was to be 10 preferred? 11 MR. GRENEMAN: 12 A. In my view, yes. 13 MR. LUK: 14 Q. And that's based in consideration of the 15 factors that we were just talking about? 16 MR. GRENEMAN: 17 A. Yes. 18 MR. LUK: 19 Q. So once again I'm not an expert at this and 20 I'm not very good at math, but it seems to me 21 that--it's not clear to me that the factors 22 that you list would favour the revenue 23 requirement method over the number of 24 customers' method and I'm just curious to see 25 if you can elaborate on the reasoning behind</p>

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<p>1 your views. So, for instance, with respect to</p> <p>2 transparency, my understanding is the revenue</p> <p>3 requirement method allocates the cost of the</p> <p>4 rural deficit to customers based on</p> <p>5 establishing an equal revenue to cost ratio?</p> <p>6 MR. GRENEMAN:</p> <p>7 A. In effect.</p> <p>8 MR. LUK:</p> <p>9 Q. But the customer, the number -</p> <p>10 MR. GRENEMAN:</p> <p>11 A. May I--sorry, can I elaborate on that?</p> <p>12 MR. LUK:</p> <p>13 Q. Yes.</p> <p>14 MR. GRENEMAN:</p> <p>15 A. That's assuming that the revenue to cost</p> <p>16 ratios were even before the application of the</p> <p>17 rural deficit. They may not have been.</p> <p>18 MR. LUK:</p> <p>19 Q. Okay. But the number of customers' method is</p> <p>20 merely just a division of the total amount of</p> <p>21 the rural deficit against the number of</p> <p>22 customers in the subsidizing classes?</p> <p>23 MR. GRENEMAN:</p> <p>24 A. My personal issue on the number of customers'</p> <p>25 method and this is subject to my understanding</p>	<p>1 Q. And my understanding is that unless there is a</p> <p>2 major migration within the province or from</p> <p>3 the province or from outside the province,</p> <p>4 that in terms of stability, the number of</p> <p>5 customers' method would result in pretty good</p> <p>6 stability as well, would it not?</p> <p>7 MR. GRENEMAN:</p> <p>8 A. I could be.</p> <p>9 MR. LUK:</p> <p>10 Q. Whereas there may be changes to the revenue</p> <p>11 requirement that may result in instability?</p> <p>12 MR. GRENEMAN:</p> <p>13 A. Well, in thinking about this, you know,</p> <p>14 there's a particular imbalance where there are</p> <p>15 a lot of customers in one jurisdiction versus</p> <p>16 very few customers in another, that perhaps</p> <p>17 can cause some issues. One system, rather,</p> <p>18 not jurisdiction versus the other system. The</p> <p>19 revenue method, it doesn't matter.</p> <p>20 MR. LUK:</p> <p>21 Q. Sorry, maybe I'm misunderstanding, but did you</p> <p>22 say that the--an imbalance in the number of</p> <p>23 customers would cause instability?</p> <p>24 MR. GRENEMAN:</p> <p>25 A. Well, just picking an extreme, just surmising</p>
<p>Page 122</p> <p>1 of it, which may or may not be what Hydro</p> <p>2 intended, you know, Hydro's analysis, is that</p> <p>3 it would charge commercial customers the same</p> <p>4 as residential customers, same charge per</p> <p>5 customer and I'm not sure if that sits well</p> <p>6 with me or not. And that's why I like the</p> <p>7 revenue method.</p> <p>8 MR. LUK:</p> <p>9 Q. Okay. Are there other reasons based on the</p> <p>10 transparencies of application and stability</p> <p>11 criteria that you would list for preferring</p> <p>12 the revenue requirement to the number of</p> <p>13 customers' method?</p> <p>14 MR. GRENEMAN:</p> <p>15 A. No, administrative ease, transparency and</p> <p>16 stability, those factors were pencilled in by</p> <p>17 me, not with relation to the customer method,</p> <p>18 but rather in relation to the existing method.</p> <p>19 And I see each one of these factors as short-</p> <p>20 comings in the existing methodology versus the</p> <p>21 revenue methodology. I have not compared them</p> <p>22 to the customer methodology, which also has</p> <p>23 the merit of transparency, administrative</p> <p>24 ease.</p> <p>25 MR. LUK:</p>	<p>Page 124</p> <p>1 that what if, for example, there were ten</p> <p>2 times as many customers--it's still per</p> <p>3 customer, so it doesn't make a difference.</p> <p>4 I'll retract what I said.</p> <p>5 MR. LUK:</p> <p>6 Q. Okay, so my understanding, correct me if I'm</p> <p>7 wrong, is unless there's a major migration</p> <p>8 between the different systems, that the number</p> <p>9 of customers' method would be quite stable.</p> <p>10 MR. GRENEMAN:</p> <p>11 A. I would assume so.</p> <p>12 MR. LUK:</p> <p>13 Q. Okay. And I think you said just now that</p> <p>14 these factors of transparency, ease of</p> <p>15 application and stability that you were</p> <p>16 applying were based on a critique of the</p> <p>17 current existing method and that's how you got</p> <p>18 to these alternative methods?</p> <p>19 MR. GRENEMAN:</p> <p>20 A. Yes, that's correct.</p> <p>21 MR. LUK:</p> <p>22 Q. So what about as between the number of</p> <p>23 customers' method and the revenue requirement</p> <p>24 method, are there factors that you would apply</p> <p>25 to critique one versus the other?</p>

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1 MR. GRENEMAN:
 2 A. A lot of these have the same, I could apply
 3 equally, administrative ease is applicable to
 4 both revenue and customer; transparency,
 5 perception of fairness, I would probably say
 6 more to the revenue method, but that that may
 7 be argumentative. As I indicated, I, you
 8 know, depended upon how it's applied, if a
 9 residential customer pays so many dollars and
 10 that's equal to a larger commercial customer,
 11 I'm not sure if that's fair or not.

12 MR. LUK:
 13 Q. Okay, so are there other factors to apply,
 14 though, to analyze between these two
 15 alternatives?

16 MR. GRENEMAN:
 17 A. Are there other factors?

18 MR. LUK:
 19 Q. Other than transparency, ease of application
 20 and stability.

21 MR. GRENEMAN:
 22 A. Yes, you had asked me that, there probably
 23 are. This is just an offhand list.

24 MR. LUK:
 25 Q. Okay. I think that concludes our request

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1 witness. Thank you, Mr. Greneman;
 2 CHAIRMAN:
 3 Q. Ms. Dawson, do you have anything?
 4 MS. DAWSON:
 5 Q. No, I don't. I have no questions for this
 6 witness. Thank you.

7 CHAIRMAN:
 8 Q. I think we're over to you, Madam.

9 GREENE, Q.C.:
 10 Q. Yes, thank you, Mr. Chair.

11 MR. ROBERT GRENEMAN, CROSS-EXAMINATION BY MS. MAUREEN
 12 GREENE, Q.C.:
 13 GREENE, Q.C.:
 14 Q. Just a couple, Mr. Greneman, two areas. I
 15 just want to clarify for the record the
 16 example that you referred to Indiana, I
 17 believe.

18 MR. GRENEMAN:
 19 A. Yes.

20 GREENE, Q.C.:
 21 Q. Is it correct that the industrial rates were
 22 reduced and residential customers' rates were
 23 increased to offset the reduction in the
 24 industrial customer rates? Is that how I
 25 understood the example?

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1 MR. GRENEMAN:
 2 A. The industrial customer rates were reduced
 3 based upon, let me call it lobbying by the
 4 industrial customers, I don't know if that's
 5 the proper word and special contracts being
 6 signed to reduce the rates. It's not clear
 7 that the residential--it's not clear to me
 8 that residential rates were increased, but
 9 rather growth in residential customers has
 10 helped the utility stay whole from 1985 for a
 11 twenty-some-odd year period.

12 GREENE, Q.C.:
 13 Q. So I'm correct in saying, then, that that is
 14 not an example of where there was
 15 subsidization from one customer group to
 16 another, even in the same system? You're not
 17 clear that there was that subsidization?

18 MR. GRENEMAN:
 19 A. As time passed from 1985 through the 1990s, if
 20 one were to do a cost of service study at some
 21 point in between, it would be observed that
 22 industrial customers were paying roughly 50
 23 percent of their cost of service. So there
 24 was a subsidy in effect, but it wasn't
 25 declared, per se, a subsidy but insofar as

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1 there wasn't a rate case to declare it.
 2 GREENE, Q.C.:
 3 Q. And you also mention there was no rate case in
 4 those intervening years, is that correct?
 5 MR. GRENEMAN:
 6 A. That's correct.

7 GREENE, Q.C.:
 8 Q. So this issue of the apparent increasing
 9 subsidy was not reviewed by the regulator?
 10 MR. GRENEMAN:
 11 A. It was not reviewed by the regulator until
 12 about twenty-some-odd years later.

13 GREENE, Q.C.:
 14 Q. And that was the only example that you could
 15 think of where there was an issue of a
 16 significant cross-subsidization, even within a
 17 customer group served from the same system?
 18 MR. GRENEMAN:
 19 A. No, it is not. I had responded to that
 20 question in terms of the magnitude that was
 21 asked, but there are numerous examples, even
 22 in, I believe in Nova Scotia there are
 23 customer classes that are paying a revenue to
 24 cost covered ratio of 0.95, others that are
 25 paying close to 1.05 and these are inherent

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<p>1 subsidies that are - 2 (12:30 p.m.) 3 GREENE, Q.C.: 4 Q. Based upon targets set by the regulator for 5 customers that are served from the same 6 system, is that correct? 7 MR. GRENEMAN: 8 A. Correct, yes. 9 GREENE, Q.C.: 10 Q. You were asked a question by Mr. Johnson as to 11 whether it would be appropriate, from a 12 transparency perspective, for the amount of 13 the subsidy to be indicated on bills. 14 MR. GRENEMAN: 15 A. Yes. 16 GREENE, Q.C.: 17 Q. Your response was, "No, you did not think that 18 that was appropriate" and the notes that I 19 made, in your response you indicated that it 20 was "sensitive" and that was the reason why it 21 would not be shown on the bills. And my first 22 question on this topic is, who is it sensitive 23 to, the customer, the utility, the government, 24 who in this case gave the policy direction, 25 who were you referring to?</p>	<p>1 GREENE, Q.C.: 2 Q. We also had discussion this morning about the 3 importance of efficient price signals. 4 MR. GRENEMAN: 5 A. Yes. 6 GREENE, Q.C.: 7 Q. And I believe you also, in response to 8 questions from Mr. Johnson, indicated that 9 that was important. Why in your perspective 10 is that important? 11 MR. GRENEMAN: 12 A. Did I say it was not important? 13 GREENE, Q.C.: 14 Q. No, no, you said it was important. 15 MR. GRENEMAN: 16 A. Oh, it was important. 17 GREENE, Q.C.: 18 Q. That's my understanding. Did I get that 19 correctly? 20 MR. GRENEMAN: 21 A. Well price signals are important in general, 22 but when there's a disproportionate 23 application, in my view, disproportionate 24 application of the rural deficit so as to 25 increase Labrador rates proportionately higher</p>
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<p>1 MR. GRENEMAN: 2 A. This is strictly my point, and I'm not 3 speaking on behalf of Hydro, I would say 4 primarily ratepayers. It's not something I 5 would expect to be a line item on a bill. 6 GREENE, Q.C.: 7 Q. How does that relate to transparency which you 8 said is one of the guiding factors where the 9 rates should be transparent or one of the 10 principles generally reviewed is that the 11 rates be transparent to the customer who pays 12 the rate? 13 MR. GRENEMAN: 14 A. When I wrote "transparency", I was referring 15 to transparency and application, I'm not 16 against per se having a line item, I think it 17 would be highly unusual to have a line item on 18 a bill for rural subsidy. One can and I'm not 19 speaking for Hydro at all. 20 GREENE, Q.C.: 21 Q. But in answer to the question, you're saying 22 it was sensitive, you were thinking 23 sensitivity from the customer perspective? 24 MR. GRENEMAN: 25 A. Yes.</p>	<p>1 than Newfoundland Power rates, that component 2 of cost imparts more over price signal to 3 Newfoundland Power customers than--I'm sorry, 4 to Labrador interconnected customers than it 5 does to Newfoundland Power customers, that 6 increment, that delta. 7 GREENE, Q.C.: 8 Q. And that, in your consideration, the fact that 9 it's coming from the rural deficit, is that 10 significant or not in the price signal that's 11 being sent? 12 MR. GRENEMAN: 13 A. I'm sorry, I didn't get the whole question. 14 GREENE, Q.C.: 15 Q. You mentioned from your perspective the 16 current method provides a disproportionate 17 share of the rural deficit to the Labrador 18 interconnected customers. 19 MR. GRENEMAN: 20 A. Yes. 21 GREENE, Q.C.: 22 Q. And that therefore, they're getting a 23 disproportionate price signal. Have I stated 24 that correctly. 25 MR. GRENEMAN:</p>

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1 A. Yes.

2 GREENE, Q.C.:

3 Q. And I asked, my question is, isn't it a

4 relative consideration, the fact of that where

5 the deficit is coming from, that it is not a

6 cost associated with serving either group of

7 customers?

8 MR. GRENEMAN:

9 A. That is relevant.

10 GREENE, Q.C.:

11 Q. Moving to the specifically assigned charge, in

12 response to a question from Mr. O'Reilly, you

13 acknowledge that there was potential for

14 inequity in the current way of calculating the

15 O&M charge that's currently used, is that

16 correct?

17 MR. GRENEMAN:

18 A. Yes.

19 GREENE, Q.C.:

20 Q. I understood also from your evidence that the

21 current basis for calculating the specifically

22 assigned charge is the one that is used in

23 most regulatory jurisdictions that you are

24 familiar with, is that correct?

25 MR. GRENEMAN:

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1 A. If I can just clarify, the method of

2 apportioning O&M expense on original cost

3 plant is what is used in most jurisdictions.

4 In many--I cannot say for certain that O&M is

5 apportioned to specific customers on that

6 basis. Sometimes there are separate

7 agreements and separate handling of O&M

8 charges for a specific customer, directly

9 assigned to large customers.

10 GREENE, Q.C.:

11 Q. So when you say there may be separate

12 agreements, you mean between the customer and

13 the service provider?

14 MR. GRENEMAN:

15 A. Yes.

16 GREENE, Q.C.:

17 Q. But would it not have been subject to

18 regulation?

19 MR. GRENEMAN:

20 A. Not subject to regulation. Oh the server--I'm

21 sorry, the service provided being the utility?

22 GREENE, Q.C.:

23 Q. Yes.

24 MR. GRENEMAN:

25 A. Subject to regulation.

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1 GREENE, Q.C.:

2 Q. But you're not familiar with any examples, are

3 you, I understood from your answer?

4 MR. GRENEMAN:

5 A. I would have to dig them out.

6 GREENE, Q.C.:

7 Q. So you're not certain whether the potential

8 for inequity also exists in all those other

9 jurisdictions as well then?

10 MR. GRENEMAN:

11 A. If the potential existed, one reason would be

12 that it would be a very large new investment

13 in a particular facility, such as

14 transmission, which inordinantly would attract

15 an undue amount of O&M expense. I'm sorry

16 about going around the circle. Nothing is

17 perfect in allocation and even if there were

18 no direct assignments, it's still not a

19 perfect allocation. Older plant would need

20 more maintenance, new plant less maintenance.

21 If nothing was directly assigned, it's not

22 perfect.

23 GREENE, Q.C.:

24 Q. No, and I guess why I'm smiling, I recall

25 something another expert said that the cost of

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1 service is not a science, it is really a

2 question of judgment, constrained by facts on

3 occasion.

4 MR. GRENEMAN:

5 A. In some part, yes.

6 GREENE, Q.C.:

7 Q. Thank you, those are all my questions, thank

8 you.

9 CHAIRMAN:

10 Q. You said price signals are important, so does

11 that mean you think the best price is a market

12 price?

13 MR. GRENEMAN:

14 A. No. Marginal cost prices are important, so

15 there's market price, there's short-term,

16 long-term and all of those play roles.

17 CHAIRMAN:

18 Q. But in determining, I mean, we used a phrase

19 "just price", what is the just price in

20 economics? Are you an economist?

21 MR. GRENEMAN:

22 A. I am not, I'm an engineer.

23 CHAIRMAN:

24 Q. Oh, so maybe I shouldn't be asking you. So I

25 won't, that's fine. Mr. Young, do you have

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1 any -

2 MR. YOUNG:

3 Q. I just have one question on re-direct.

4 MR. ROBERT GRENEMAN, RE-DIRECT EXAMINATION BY MR.

5 GEOFFREY YOUNG

6 Q. Mr. Greneman, I believe when Mr. Senwung Luk

7 was examining you on the matter of the

8 customer number approach as opposed to the

9 other one, that's proposed by Hydro, and you

10 indicated, I believe, and correct me if I'm

11 wrong, that you would be concerned if

12 different kinds of customers of different

13 sorts were allocated the same amount. I'm

14 just wondering, though, for clarification, is

15 that in the allocation process or is that

16 something that can be dealt with properly in

17 rate design?

18 MR. GRENEMAN:

19 A. I'm sorry, is it in the allocation process or

20 is it in -

21 MR. YOUNG:

22 Q. Or could it be done subsequently in rate

23 design to give the appropriate

24 MR. GRENEMAN:

25 A. It can definitely be subsequently done in rate

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1 design.

2 MR. YOUNG:

3 Q. Okay, thank you, that's my only question.

4 CHAIRMAN:

5 Q. So I think we're finished with this.

6 MS. GLYNN:

7 Q. We are, Mr. Chair. I hate to question

8 anything that you would do, but I saw you

9 check with Ms. Whalen, I didn't see you check

10 with the other Commissioners.

11 CHAIRMAN:

12 Q. Oh yes, I did.

13 MS. GLYNN:

14 Q. Okay, thank you, just clarifying.

15 CHAIRMAN:

16 Q. I accept your apology.

17 MS. GLYNN:

18 Q. Thank you very much.

19 CHAIRMAN:

20 Q. I am very sensitive about procedure.

21 MS. GLYNN:

22 Q. Mr. Chair, I'd love to say that the parties

23 actually proved me wrong in my statement to

24 you in your office earlier, that we are

25 finished with this panel. We did not think

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1 that we would be finished this early. I would

2 suggest that we break for today. We have

3 uncertainties in the schedule for tomorrow and

4 I wouldn't want to start a witness and have to

5 interrupt other schedules. I would suggest

6 that we finish for today and start tomorrow

7 once we know which party is going to go first.

8 CHAIRMAN:

9 Q. I don't think there's anybody here foolish

10 enough to object, is there? We will adjourn.

11 Upon conclusion at 1:03 p.m.

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1 CERTIFICATE

2 I, Judy Moss, hereby certify that the foregoing is a true

3 and correct transcript of a hearing in the matter of

4 Newfoundland and Labrador Hydro's General Rate

5 Application heard on the 28th of September, A.D., 2015

6 before the Commissioners of the Public Utilities Board,

7 St. John's, Newfoundland and Labrador and was transcribed

8 by me to the best of my ability by means of a sound

9 apparatus.

10 Dated at St. John's, Newfoundland and Labrador

11 this 28th day of September, A.D., 2015

12 Judy Moss

13

<p>-\$-</p> <p>\$15.27 [1] 19:23 \$3,459,597.00 [1] 117:11 \$6.10 [1] 19:24 \$67.01 [1] 19:24</p> <hr/> <p>-&-</p> <p>& [5] 106:24 107:18 110:12,19 113:2</p> <hr/> <p>-'-</p> <p>'15 [1] 55:20 '16 [1] 55:20 '92 [1] 16:6 'normalized' [1] 69:17 'til [1] 58:4</p> <hr/> <p>-.-</p> <p>.6 [1] 56:3</p> <hr/> <p>-0-</p> <p>0.95 [2] 30:17 128:24 083 [1] 111:10</p> <hr/> <p>-1-</p> <p>1 [11] 6:16,21 7:12 13:16 13:18 19:15 29:9,20 68:20,24 111:10 1.05 [2] 30:18 128:25 1.1 [1] 114:11 1.13 [1] 95:18 1.2.1 [2] 19:15,16 1.4 [2] 63:3,3 1.42 [1] 28:7 10 [1] 19:23 100 [2] 96:15 99:12 10:00 [1] 40:10 10:15 [1] 50:19 10:30 [1] 62:23 10:45 [1] 75:3 10:58 [1] 85:10 11 [1] 85:6 113 [9] 90:19 91:6 92:25 93:12 94:3,23 95:11,18 96:22 11:38 [1] 85:11 11:45 [1] 91:12 12 [1] 13:24 12:00 [1] 102:19 12:15 [1] 116:13 12:30 [1] 129:2 13 [3] 19:14 96:21 118:7 14 [2] 107:5,11 14.164 [1] 116:25 140 [1] 69:1 142 [3] 90:15 91:2 93:1</p>	<p>15 [3] 81:18 107:5,11 18 [1] 14:22 19.6 [1] 69:19 1983 [1] 100:23 1985 [4] 100:25 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