IN THE MATTER OF the *Electrical Power Control Act, 1994,* SNL 1994, Chapter E-5.1 and the *Public Utilities Act,* RSNL 1990, Chapter P-47, and regulations thereunder; and

IN THE MATTER OF a general rate application by Newfoundland and Labrador Hydro to establish customer electricity rates for 2027.

Requests for Information by
Newfoundland Power Inc.

To: The Brattle Group Inc. ("Brattle Group")

NP-PUB-001 to NP-PUB-010

November 13, 2026

Requests for Information

NP-PUB-001 Given that performance under the proposed incentive framework has not yet been observed, would Brattle consider it reasonable to approve the hydraulic Generation Credit for the 2027 Test Year on an interim basis and reconsider it once operating experience under the new incentive framework is available? If so, please indicate when Brattle considers such reconsideration should occur. If not, please explain.

(Brattle Group, Review of Cost of Service, the Long-Term Supply Cost Variance Deferral Account, and Island Industrial Rate Design, November 2, 2026, Section I.C, pages 18-22)

NP-PUB-002 The Brattle Group report recommends that Newfoundland Power's hydraulic Generation Credit be calculated using a defined rule that rolls the five-year historical period forward as each year's data become available. Please clarify whether Brattle recommends that:

a) the hydraulic Generation Credit be recalculated annually for informational and monitoring purposes, with any resulting change implemented only as part of Hydro's next general rate application;

b) the hydraulic Generation Credit be recalculated annually and the revised amount reflected annually in Newfoundland Power's Utility Rate; or

c) the hydraulic Generation Credit be recalculated annually and the revised amount incorporated into Hydro's Cost of Service Study, or otherwise used to revise customer class cost allocations between general rate applications, for rate-setting purposes.

(Brattle Group, Review of Cost of Service, the Long-Term Supply Cost Variance Deferral Account, and Island Industrial Rate Design, November 2, 2026, Section I.C.)

NP-PUB-003 Hydro has confirmed that Newfoundland Power's hydraulic and thermal generation can be measured during a single Generation Test. Please confirm whether Brattle's recommendation to consider annual Generation Test results as performance evidence can be satisfied by a single test that separately records hydraulic and thermal output. If not, please explain what additional information would be provided by separate testing.

(Brattle Group, Review of Cost of Service, the Long-Term Supply Cost Variance Deferral Account, and Island Industrial Rate Design, November 2, 2026, Section I.C; NP-NLH-167)

NP-PUB-004 Please confirm that Holyrood may be required to generate above minimum stable output to provide energy under below-average hydrological conditions. If confirmed, please explain how this was considered in distinguishing between demand-related and energy-related fuel costs and whether Brattle recommends that classification remain fixed for the Test Year or vary with actual operating conditions.

(Brattle Group, Review of Cost of Service, the Long-Term Supply Cost Variance Deferral Account, and Island Industrial Rate Design, November 2, 2026, pages 10-13; Newfoundland and Labrador Hydro 2026 General Rate Application, May 27, 2026, Volume II, Exhibit 4, Load Forecast and Sources of Supply)

NP-PUB-005 Brattle Group recommends allocating energy-related Holyrood costs using energy consumption during the Holyrood commitment period rather than annual energy consumption because Holyrood operates seasonally. Please explain why the same consideration does not support using customer class demand during the commitment period to allocate demand-related Holyrood costs, rather than contribution to the single annual coincident peak.

(Brattle Group, Review of Cost of Service, the Long-Term Supply Cost Variance Deferral Account, and Island Industrial Rate Design, November 2, 2026, pages 10–16)

NP-PUB-006 Does Brattle Group agree that classifying a cost as demand-related is a separate determination from selecting the appropriate demand allocator? If not, please explain. If confirmed, please explain the cost-causation basis for allocating the demand-related portion of Holyrood costs based on the single annual coincident peak.

(Brattle Group, Review of Cost of Service, the Long-Term Supply Cost Variance Deferral Account, and Island Industrial Rate Design, November 2, 2026, pages 10-16)

NP-PUB-007 Brattle Group recommends treating Holyrood Unit 3 separately and functionalizing its operating costs as transmission in the months it operates as a synchronous condenser. Please confirm whether, prior to Unit 3 operating as a synchronous condenser year-round, Brattle's recommendation is limited to operating costs associated with its synchronous-condenser operation and does not change the functionalization of Unit 3 rate base or depreciation. If this cannot be confirmed, please explain which additional Unit 3 costs Brattle recommends functionalizing as transmission and the basis for that treatment.

(Brattle Group, Review of Cost of Service, the Long-Term Supply Cost Variance Deferral Account, and Island Industrial Rate Design, November 2, 2026, pages 17-18; Order No. P.U. 37 (2019))

NP-PUB-008 Does Brattle Group agree that recognizing the reduction in Hydro-supplied peak demand attributable to Newfoundland Power's generation is consistent with cost causation? If not, please explain. If confirmed, please explain whether the same principle applies to Newfoundland Power's hydraulic and thermal generation and whether both should receive consistent treatment in determining Newfoundland Power's demand responsibility.

(Brattle Group, Review of Cost of Service, the Long-Term Supply Cost Variance Deferral Account, and Island Industrial Rate Design, November 2, 2026, pages 18-22; PUB-NLH-108)

NP-PUB-009 Brattle Group recommends that 93.06% of Holyrood fuel costs be classified as demand-related and 6.94% as energy-related. Brattle notes that Hydro's recalculation under this approach reduces the Island Industrial revenue requirement by approximately $2.481 million. Please confirm that this reduction represents a reallocation of Hydro's revenue requirement among customer classes rather than a reduction in Hydro's total revenue requirement. If confirmed, please quantify the resulting change in the revenue requirement allocated to Newfoundland Power before application of Government rate mitigation.

(Brattle Group, Review of Cost of Service, the Long-Term Supply Cost Variance Deferral Account, and Island Industrial Rate Design, November 2, 2026, pages 10–13)

NP-PUB-010 The NARUC Cost Allocation Manual recognizes that customer class demand outside the single system peak may be relevant to allocating demand-related production costs where reliability requirements extend across multiple hours. Please explain whether Brattle considered this principle in recommending a single coincident-peak allocator for demand-related Holyrood costs and why Brattle considers the single annual coincident peak to appropriately reflect Holyrood's winter reliability requirements.

(Brattle Group, Review of Cost of Service, the Long-Term Supply Cost Variance Deferral Account, and Island Industrial Rate Design, November 2, 2026, pages 10–16; NARUC, Electric Utility Cost Allocation Manual (January 1992), pages 39-47)

RESPECTFULLY SUBMITTED at St. John's, Newfoundland and Labrador, this 13th day of November, 2026.



NEWFOUNDLAND POWER INC.
P.O. Box 8910
55 Kenmount Road
St. John's, Newfoundland and Labrador
A1B 3P6

Telephone: (709) 737-5500 ext. 6200
Telecopier: (709) 737-2974