

1 Q. **Reference: Schedule D-IV (Volume 1, page 238, note 2); Schedule D-III (page 237, note 3);**
2 **Schedule D-II (pages 233, 235); Order No. P.U. 16(2019), page 69 (item 7(c))**

3 Confirm whether the disallowed portion of the Debt Guarantee Fee reflected in the current
4 filing's "*Interest Cost of Service Exclusions*" line traces directly to the disallowance ordered in
5 Order No. P.U. 16(2019) item 7(c), and if so, describe the methodology used to calculate the
6 disallowed amount in each year since 2019. Provide a narrative and, if available, a calculation
7 showing the continuity (or lack of continuity) between the P.U. 16(2019) disallowance and the
8 disallowed amounts embedded in the current filing for each Test Year and actual year from 2019
9 to 2027. If the current disallowance methodology differs from what P.U. 16(2019) ordered,
10 explain the difference and its basis.

11
12
13 A. The disallowed portion of the Debt Guarantee Fee reflected in the current filing's "*Interest Cost*
14 *of Service Exclusions*" line traces directly to the disallowance ordered in Board of Commissioners
15 of Public Utilities Order No. P.U. 16(2019), item 7(c). Please refer to CA-NLH-103, Attachment 1
16 for the year-over-year calculation of the Debt Guarantee Fee, including cost of service
17 exclusions.

18 The methodology used to calculate the disallowed amount reflects commitments established
19 under Undertaking 139 of Newfoundland and Labrador Hydro's ("Hydro") 2013 Amended
20 General Rate Application.¹ Specifically, the methodology assumes that:

- 21 • The Debt Guarantee Fee applicable to long-term debt is set within a range of 35 to 47
22 basis points, with the resulting savings shared equally (50/50) between customers and
23 Hydro. 41 basis points is used in the calculation as it is the midpoint of that range;
- 24 • The Debt Guarantee Fee applicable to short-term debt is based on an equal (50/50)
25 sharing of the savings achieved; and

¹ Please refer to PUB-NLH-072, Attachment 2 of this proceeding for a copy of Undertaking 139.

- 1 • Government of Newfoundland and Labrador (“Government”) on-lending to Hydro² is
- 2 excluded from the calculation.

² For recent debt issues, Government issues debt in the capital markets and on-lends the proceeds to Hydro. Debt Guarantee Fees associated with this are included in the calculation of the disallowed amount.

Newfoundland and Labrador Hydro
Debt Guarantee Fee and Cost of Service Exclusions
2019 Test Year Debt Guarantee Fee

Background

Newfoundland and Labrador Hydro (NLH) is to pay to the Government of Newfoundland and Labrador an annual fee for any of its obligations guaranteed or on-lent by the Province. The fee is calculated by applying a guarantee fee rate to the balance of any guaranteed or on-lent obligations of NLH, net of related sinking funds, outstanding at December 31 of the immediately preceding year as reported in NLH's annual financial statements. The guarantee fee rate is as follows:

Calculation

End of immediately preceding fiscal year

31-Dec-18

Year Issued	Series	Interest Rate	Maturity Date	Years to Maturity	Long-term debt Par (000's)	Carrying value of Long-term debt Net of sinking fund (Previous Yr)(000's)	Guarantee Fee Rate	Guarantee Fee (000's)
1996	Y	8.400%	27-Feb-2026	7.16	300,000	162,547	0.50%	813
2001	AB	6.650%	27-Aug-2031	12.66	300,000	211,372	0.50%	1,057
2003	AD	5.700%	14-Jul-2033	14.55	125,000	89,072	0.50%	445
2014/2017	AF	3.600%	1-Dec-2045	26.94	500,000	480,429	0.50%	2,402
2017	NEW	3.700%	2047-11-01	28.85	300,000	300,000	0.50%	1,500
2017	NEW	3.400%	2027-11-01	8.84	200,000	200,000	0.25%	500
2018	NEW	4.250%	2048-08-01	29.61	300,000	250,000	0.50%	1,250
						\$ 1,693,419		7,967
Promissory Notes						114,927	0.25%	287
2017 Compliance Application Adjustment								259
2019 Test Yr Debt Guarantee Fee								\$ 8,513

Recoverable Portion

Year Issued	Series	Interest Rate	Maturity Date	Years to Maturity	Long-term debt Par (000's)	Carrying value of Long-term debt Net of sinking fund (Previous Yr)(000's)	Guarantee Fee Rate	Guarantee Fee (000's)
1996	Y	8.400%	27-Feb-2026	7.16	300,000	162,547	0.205%	333
2001	AB	6.650%	27-Aug-2031	12.66	300,000	211,372	0.205%	433
2003	AD	5.700%	14-Jul-2033	14.55	125,000	89,072	0.205%	183
2014/2017	AF	3.600%	1-Dec-2045	26.94	500,000	480,429	0.205%	985
2017	NEW	3.700%	2047-11-01	28.85	300,000	300,000		-
2017	NEW	3.400%	2027-11-01	8.84	200,000	200,000		-
2018	NEW	4.250%	2048-08-01	29.61	300,000	250,000		-
						\$ 1,693,419		1,934
Promissory Notes						114,927	0.125%	144
2017 Compliance Application Adjustment								125
Immaterial difference								9
2019 Test Yr Debt Guarantee Fee (Recoverable Portion)								\$ 2,212
Cost of Service Exclusion (2019 Test Yr Debt Guarantee Fee less Recoverable Portion)								\$ 6,302

Newfoundland and Labrador Hydro
Debt Guarantee Fee and Cost of Service Exclusions
2019 Debt Guarantee Fee

Background

Newfoundland and Labrador Hydro (NLH) is to pay to the Government of Newfoundland and Labrador an annual fee for any of its obligations guaranteed or on-lent by the Province. The fee is calculated by applying a guarantee fee rate to the balance of any guaranteed or on-lent obligations of NLH, net of related sinking funds, outstanding at December 31 of the immediately preceding year as reported in NLH's annual financial statements.

The guarantee fee rate is as follows:

Calculation

End of immediately preceding fiscal year

31-Dec-18

[illegible]

Recoverable Portion

[illegible]

Newfoundland and Labrador Hydro
Debt Guarantee Fee and Cost of Service Exclusions
2020 Debt Guarantee Fee

Background

Newfoundland and Labrador Hydro (NLH) is to pay to the Government of Newfoundland and Labrador an annual fee for any of its obligations guaranteed or on-lent by the Province. The fee is calculated by applying a guarantee fee rate to the balance of any guaranteed or on-lent obligations of NLH, net of related sinking funds, outstanding at December 31 of the immediately preceding year as reported in NLH's annual financial statements.

The guarantee fee rate is as follows:

Calculation

End of immediately preceding fiscal year

31-Dec-19

[illegible]

Recoverable Portion

Year Issued	Series	Interest Rate	Maturity Date	Years to Maturity	Long-term debt Par (000's)	Carrying value of Long-term debt Net of sinking fund (Previous Yr)(000's)	Guarantee Fee Rate	Guarantee Fee (000's)
1996	Y	8.400%	27-Feb-2026	6.16	300,000	173,718	0.205%	356
2001	AB	6.650%	27-Aug-2031	11.66	300,000	220,387	0.205%	452
2003	AD	5.700%	14-Jul-2033	13.55	125,000	93,649	0.205%	192
2014/2017	AF	3.600%	1-Dec-2045	25.94	500,000	480,851	0.205%	985
2017/2018	1A	3.700%	17-Oct-2048	28.82	600,000	639,763	0.000%	-
					\$	1,608,368		1,985
Promissory Notes						233,000	0.125%	291
2020 Debt Guarantee Fee (Recoverable Portion)								\$ 2,276
Cost of Service Exclusion (2020 Debt Guarantee Fee less Recoverable Portion)								\$ 6,348

Newfoundland and Labrador Hydro
Debt Guarantee Fee and Cost of Service Exclusions
2021 Debt Guarantee Fee

Background

Newfoundland and Labrador Hydro (NLH) is to pay to the Government of Newfoundland and Labrador an annual fee for any of its obligations guaranteed or on-lent by the Province. The fee is calculated by applying a guarantee fee rate to the balance of any guaranteed or on-lent obligations of NLH, net of related sinking funds, outstanding at December 31 of the immediately preceding year as reported in NLH's annual financial statements.

The guarantee fee rate is as follows:

Calculation

End of immediately preceding fiscal year

31-Dec-20

[illegible]

Recoverable Portion

Year Issued	Series	Interest Rate	Maturity Date	Years to Maturity	Long-term debt Par (000's)	Carrying value of Long-term debt Net of sinking fund (Previous Yr)(000's)	Guarantee Fee Rate	Guarantee Fee (000's)
1996	Y	8.400%	27-Feb-2026	5.16	300,000	165,044	0.205%	338
2001	AB	6.650%	27-Aug-2031	10.66	300,000	213,133	0.205%	437
2003	AD	5.700%	14-Jul-2033	12.54	125,000	91,049	0.205%	187
2014/2017	AF	3.600%	1-Dec-2045	24.93	500,000	481,291	0.205%	987
2017/2018	1A	3.700%	17-Oct-2048	27.81	600,000	638,914	0.000%	-
					\$	1,589,431		1,949
Promissory Notes						262,000	0.125%	328
2021 Debt Guarantee Fee (Recoverable Portion)								\$ 2,276
Cost of Service Exclusion (2021 Debt Guarantee Fee less Recoverable Portion)								\$ 6,326

Newfoundland and Labrador Hydro
Debt Guarantee Fee and Cost of Service Exclusions
2022 Debt Guarantee Fee

Background

Newfoundland and Labrador Hydro (NLH) is to pay to the Government of Newfoundland and Labrador an annual fee for any of its obligations guaranteed or on-lent by the Province. The fee is calculated by applying a guarantee fee rate to the balance of any guaranteed or on-lent obligations of NLH, net of related sinking funds, outstanding at December 31 of the immediately preceding year as reported in NLH's annual financial statements.

The guarantee fee rate is as follows:

Calculation

End of immediately preceding fiscal year

31-Dec-21

[illegible]

Recoverable Portion

<u>Year Issued</u>	<u>Series</u>	<u>Interest Rate</u>	<u>Maturity Date</u>	<u>Years to Maturity</u>	<u>Long-term debt Par (000's)</u>	<u>Carrying value of Long-term debt Net of sinking fund (Previous Yr)(000's)</u>	<u>Guarantee Fee Rate</u>	<u>Guarantee Fee (000's)</u>
1996	Y	8.400%	27-Feb-2026	4.16	300,000	156,069	0.205%	320
2001	AB	6.650%	27-Aug-2031	9.66	300,000	205,535	0.205%	421
2003	AD	5.700%	14-Jul-2033	11.54	125,000	88,359	0.205%	181
2014/2017	AF	3.600%	1-Dec-2045	23.93	500,000	481,749	0.205%	988
2017/2018	1A	3.700%	17-Oct-2048	26.81	600,000	638,036	0.00%	-
2021	2A	1.750%	2-Jun-2030	8.42	300,000	286,582	0.00%	-
						\$ 1,856,329		1,910
Promissory Notes						55,000	0.125%	69
2022 Debt Guarantee Fee (Recoverable Portion)								\$ 1,979
Cost of Service Exclusion (2022 Debt Guarantee Fee less Recoverable Portion)								\$ 6,724

Newfoundland and Labrador Hydro
Debt Guarantee Fee and Cost of Service Exclusions
2023 Debt Guarantee Fee

Background

Newfoundland and Labrador Hydro (NLH) is to pay to the Government of Newfoundland and Labrador an annual fee for any of its obligations guaranteed or on-lent by the Province. The fee is calculated by applying a guarantee fee rate to the balance of any guaranteed or on-lent obligations of NLH, net of related sinking funds, outstanding at December 31 of the immediately preceding year as reported in NLH's annual financial statements.

The guarantee fee rate is as follows:

Calculation

End of immediately preceding fiscal year

31-Dec-22

[illegible]

Recoverable Portion

[illegible]

Newfoundland and Labrador Hydro
Debt Guarantee Fee and Cost of Service Exclusions
2024 Debt Guarantee Fee

Background

Newfoundland and Labrador Hydro (NLH) is to pay to the Government of Newfoundland and Labrador an annual fee for any of its obligations guaranteed or on-lent by the Province. The fee is calculated by applying a guarantee fee rate to the balance of any guaranteed or on-lent obligations of NLH, net of related sinking funds, outstanding at December 31 of the immediately preceding year as reported in NLH's annual financial statements.

The guarantee fee rate is as follows:

Calculation

End of immediately preceding fiscal year

31-Dec-23

[illegible]

Recoverable Portion

[illegible]

Newfoundland and Labrador Hydro
Debt Guarantee Fee and Cost of Service Exclusions
2025 Forecasted and Actual Debt Guarantee Fee

Background

Newfoundland and Labrador Hydro (NLH) is to pay to the Government of Newfoundland and Labrador an annual fee for any of its obligations guaranteed or on-lent by the Province. The fee is calculated by applying a guarantee fee rate to the balance of any guaranteed or on-lent obligations of NLH, net of related sinking funds, outstanding at December 31 of the immediately preceding year as reported in NLH's annual financial statements.

The guarantee fee rate is as follows:

Calculation

End of immediately preceding fiscal year

31-Dec-24

[illegible]

Recoverable Portion

[illegible]

Newfoundland and Labrador Hydro
Debt Guarantee Fee and Cost of Service Exclusions
2026 Forecasted Debt Guarantee Fee

Background

Newfoundland and Labrador Hydro (NLH) is to pay to the Government of Newfoundland and Labrador an annual fee for any of its obligations guaranteed or on-lent by the Province. The fee is calculated by applying a guarantee fee rate to the balance of any guaranteed or on-lent obligations of NLH, net of related sinking funds, outstanding at December 31 of the immediately preceding year as reported in NLH's annual financial statements. The guarantee fee rate is as follows:

Calculation

End of immediately preceding fiscal year

31-Dec-25

Year	Series	Interest	Maturity	Years to	Long-term debt	Carrying value of Long-term debt	Guarantee Fee	Guarantee
Issued	Series	Rate	Date	Maturity	Par (000's)	Net of sinking fund (Previous Yr)(000's)	Rate	Fee (000's)
1996	Y	8.400%	27-Feb-2026	0.16	300,000	117,803	0.50%	589
2001	AB	6.650%	27-Aug-2031	5.66	300,000	172,393	0.50%	862
2003	AD	5.700%	14-Jul-2033	7.54	125,000	76,774	0.50%	384
2014/2017	AF	3.600%	1-Dec-2045	19.93	500,000	483,764	0.50%	2,419
2017/2018	1A	3.700%	17-Oct-2048	22.81	600,000	634,229	0.50%	3,171
2021	2A	1.750%	2-Jun-2030	4.42	300,000	292,630	0.25%	732
New 2025	NEW	4.600%	2055-10-17	29.81	300,000	296,983	0.50%	1,485
						\$ 2,074,575		9,641
Promissory Notes						279,853	0.25%	700
2026 Forecasted Debt Guarantee Fee							\$	10,341
Schedule D-IV: 2026 Forecast Debt Guarantee Fee							\$	10,327
							\$	14 Immaterial Difference
Recoverable Portion								
Year	Series	Interest	Maturity	Years to	Long-term debt	Carrying value of Long-term debt	Guarantee Fee	Guarantee
Issued	Series	Rate	Date	Maturity	Par (000's)	Net of sinking fund (Previous Yr)(000's)	Rate	Fee (000's)
1996	Y	8.400%	27-Feb-2026	0.16	300,000	117,803	0.205%	241
2001	AB	6.650%	27-Aug-2031	5.66	300,000	172,393	0.205%	353
2003	AD	5.700%	14-Jul-2033	7.54	125,000	76,774	0.205%	157
2014/2017	AF	3.600%	1-Dec-2045	19.93	500,000	483,764	0.205%	992
2017/2018	1A	3.700%	17-Oct-2048	22.81	600,000	634,229	0.00%	-
2021	2A	1.750%	2-Jun-2030	4.42	300,000	292,630	0.00%	-
New 2025	NEW	4.600%	2055-10-17	29.81	300,000	296,983	0.00%	-
						\$ 2,074,575		1,744
Promissory Notes						279,853	0.125%	350
2026 Forecasted Debt Guarantee Fee (Recoverable Portion)							\$	2,094
Cost of Service Exclusion (2026 Forecasted Debt Guarantee Fee less Recoverable Portion)							\$	8,247
Schedule D-IV: Cost of Service Exclusion (2026 Forecast Debt Guarantee Fee less Recoverable Portion)							\$	8,253
							\$	(6) Immaterial Difference

Newfoundland and Labrador Hydro
Debt Guarantee Fee and Cost of Service Exclusions
2027 Test Year Debt Guarantee Fee

Background

Newfoundland and Labrador Hydro (NLH) is to pay to the Government of Newfoundland and Labrador an annual fee for any of its obligations guaranteed or on-lent by the Province. The fee is calculated by applying a guarantee fee rate to the balance of any guaranteed or on-lent obligations of NLH, net of related sinking funds, outstanding at December 31 of the immediately preceding year as reported in NLH's annual financial statements. The guarantee fee rate is as follows:

Calculation

End of immediately preceding fiscal year

31-Dec-26

Year Issued	Series	Interest Rate	Maturity Date	Years to Maturity	Long-term debt Par (000's)	Carrying value of Long-term debt Net of sinking fund (Previous Yr)(000's)	Guarantee Fee Rate	Guarantee Fee (000's)
1996	Y	8.400%	27-Feb-2026	(0.84)	300,000	-	0.50%	-
2001	AB	6.650%	27-Aug-2031	4.66	300,000	163,633	0.50%	818
2003	AD	5.700%	14-Jul-2033	6.54	125,000	73,586	0.50%	368
2014/2017	AF	3.600%	1-Dec-2045	18.93	500,000	484,318	0.50%	2,422
2017/2018	1A	3.700%	17-Oct-2048	21.81	600,000	633,198	0.50%	3,166
2021	2A	1.750%	2-Jun-2030	3.42	300,000	294,231	0.25%	736
New 2025	3A	4.600%	2055-10-17	28.81	300,000	292,503	0.50%	1,463
New 2026	4A	4.680%	2056-08-15	29.64	200,000	200,000	0.50%	1,000
						\$ 2,141,469		9,972
Promissory Notes						245,261	0.25%	613
2027 Test Yr Debt Guarantee Fee								\$ 10,585
Schedule D-IV: 2027 Test Year Debt Guarantee Fee								\$ 10,571
								\$ 14 Immaterial Difference

Recoverable Portion

Year Issued	Series	Interest Rate	Maturity Date	Years to Maturity	Long-term debt Par (000's)	Carrying value of Long-term debt Net of sinking fund (Previous Yr)(000's)	Guarantee Fee Rate	Guarantee Fee (000's)
1996	Y	8.400%	27-Feb-2026	(0.84)	300,000	-	0.205%	-
2001	AB	6.650%	27-Aug-2031	4.66	300,000	163,633	0.205%	335
2003	AD	5.700%	14-Jul-2033	6.54	125,000	73,586	0.205%	151
2014/2017	AF	3.600%	1-Dec-2045	18.93	500,000	484,318	0.205%	993
2017/2018	1A	3.700%	17-Oct-2048	21.81	600,000	633,198	0.00%	-
2021	2A	1.750%	2-Jun-2030	3.42	300,000	294,231	0.00%	-
New 2025	3A	4.600%	2055-10-17	28.81	300,000	292,503	0.00%	-
New 2026	4A	4.680%	2056-08-15	29.64	200,000	200,000	0.00%	-
						\$ 2,141,469		1,479
Promissory Notes						245,261	0.125%	307
2027 Test Yr Debt Guarantee Fee (Recoverable Portion)								\$ 1,786
Cost of Service Exclusion (2027 Test Yr Debt Guarantee Fee less Recoverable Portion)								\$ 8,799
Schedule D-IV: Cost of Service Exclusion (2027 Test Yr Debt Guarantee Fee less Recoverable Portion)								\$ 8,792
								\$ 7 Immaterial Difference