

1 Q. **Reference: Order No. P.U. 33(2021), pages 8, 11; Volume 1, pages 170-171; Volume 3 (Exhibit**
2 **10), page 690**

3 Explain why Hydro proposes WACC-based financing charges for the Long-Term Supply Cost
4 Variance Deferral Account rather than short-term borrowing cost, embedded debt cost, risk-free
5 rate, no carrying charge, or another rate — and specifically why the reasoning the Board applied
6 in Order No. P.U. 33(2021), requiring short-term borrowing costs for the existing SCVDA, does
7 not apply here. Provide Hydro’s policy rationale, precedent analysis, risk analysis, expected
8 account balance profile, expected recovery timing, and customer impact under alternative
9 carrying-charge rates, and identify the specific utility risk for which WACC compensates Hydro.

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12 A. Please refer to Newfoundland and Labrador Hydro’s response to part b) of PUB-NLH-093 of this
13 proceeding.