

1 Q. **Reference: Volume 3, page 690 (Section B, Item 2.0); Volume 1, page 171; Order No. P.U.**
2 **33(2021), page 8**

3 a) Confirm what specific disposition protocol - trigger, timing, and approval process -
4 governs when accumulated Long-Term SCVDA balances will actually be returned to or
5 recovered from customers, given that the account definition itself does not state a
6 disposition schedule and Hydro's narrative treats disposition as a matter for "*a future*
7 *application.*" State the specific conditions (e.g., balance threshold, elapsed time, or
8 calendar trigger) that would cause Hydro to file a disposition application, and confirm
9 whether the Board or intervenors have any mechanism to compel disposition if Hydro
10 does not do so voluntarily.

11 b) Explain why the LT-SCVDA should be financed at Hydro's full WACC - a rate that includes
12 an equity return compensating for risk of non-recovery - rather than a short-term or
13 debt-like rate, having regard to the Board's holding in Order No. P.U. 33(2021), which
14 applied short-term borrowing costs to the economically similar predecessor SCVDA.
15 Provide Hydro's position on whether recovery of LT-SCVDA balances is subject to any
16 prudence, forecast, or non-recovery risk comparable to the risk WACC is meant to
17 compensate for capital investment, and if Hydro contends such risk exists, identify and
18 quantify it.

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21 A. a) Please refer to Newfoundland and Labrador Hydro's ("Hydro") response to part a) of
22 PUB-NLH-092 of this proceeding.

23 b) Please refer to Hydro's response to part b) of PUB-NLH-093 of this proceeding.