- 1 **Q.**2
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- Reference: Newfoundland Power's "Consolidation of Retail and Transmission Operations on the Island Interconnected System: A Resource Assessment," Appendix D, Table D-1, at p. D-1, filed on June 5, 2019 as Attachment A to PUBNP-084 as part of the *Rate Mitigation Options and Impacts Reference* proceeding.

Table D-1: Estimated Labour Capitalization by Position				
Position	Capital	Operating	Total	
MANAGEMENT & ENGINEERING				
Manager	68%	32%	100%	
T&D Engineering	92%	8%	100%	
Engineering/Asset Management	71%	29%	100%	
Protection and Controls	93%	7%	7% 100 %	
Power System Support	3%	97%	97% 100%	
Safety and Environment	0%	100%	100% 100%	
Transportation	80%	20%	20% 100%	
Technology	26%	74%	74% 100%	
Operations Support	47%	53%	100%	
Human Resources	0%	100%	100%	
CRAFT & SUPERVISION				
Line Supervisor	91%	9%	100%	
Line Operations	66%	34%	34% 100%	
Planner	36%	64% 100 %		
Stores	90%	10%	100%	
Maintenance Supervisor	10%	90%	100%	
Electrical Maintenance	42%	58%	100%	
Plant Operations	45%	55%	100%	
Area Customer Representative	23%	77%	100%	
Customer Service Supervisor	12%	88%	100%	
Customer Service	9%	91%	100%	
Meter Technician	90%	10%	100%	
Power System Operator	39%	61%	100%	

- a) Please provide an update, if applicable, to Table D-1 as identified above.
- b) Please provide details regarding the activities that support the capitalized percentages for each position.
- A. a) Table D-1 was a *pro forma* analysis prepared in response to Information Request PUB-NP-087 as part of the *Reference on Rate Mitigation Options and Impacts* currently before the Board. There is no applicable update to that *pro forma* analysis in relation to the Company's 2020 Capital Budget Application.

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Information Request PUB-NP-087 filed as part of the *Reference on Rate Mitigation Options and Impacts* pertained to Newfoundland Power's assessment of the resources it would require to assume responsibility for certain retail operations on the Island Interconnected System that are currently the responsibility of Newfoundland and Labrador Hydro. In that Information Request, Newfoundland Power was asked to "provide estimates of expected steady state percentages of *O&M versus capital work*." [Emphasis added].

1	b)	Newfoundland Power's capitalized labour is based on the projects outlined in
2		Company's annual capital budget filings with the Board. The <i>pro forma</i> analysis
3		provided in Table D-1 was based on 2018 capital activities. For further detail, see the
4		Company's 2018 Capital Budget Application. ²
5		
6		While labour may vary by position annually depending on the nature of the projects
7		approved, Newfoundland Power's overall capitalized labour percentages have
8		remained relatively consistent over time. ³

The Company's 2018 Capital Budget Application was approved by the Board in Order No. P.U. 37 (2017).

For example, Newfoundland Power's capital labour as a percentage of total labour is forecast to be approximately 34% in 2020. This percentage is consistent with the 10-year average of 34%. For more information, see the response to Request for Information NLH-NP-018.