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- (Reference 5.1 Rate Base Additions, Deductions and Allowances) Regarding the conservation costs:
 - a) Please provide a revised Table 4 (Page 4) that includes figures from 2009 to
 - b) For each year from 2010 to 2025F please provide a table that decomposes Conservation cost according to major components, differentiating according to customer class.
 - c) (i) Please indicate the percentage increase in domestic customer rates in 2025 and the expected increase in 2026. (ii) Separately from conservation programs, what impact does NP expect these rate increases will have on electricity consumption?
 - a) Attachment A provides the details of the deferred cost recovery related to conservation from 2009 through 2025 forecast.
 - b) Cost Recovery Deferral Conservation amounts reflect: (i) operating expenses required for the delivery of customer energy conservation program costs and approved for deferral; (ii) subsequent amortizations of those deferred costs in accordance with Board Orders; 2 and (iii) adjustments to deferred balances when required.3

See Attachment A for the requested breakdown of costs for 2009 through 2025 forecast.

The annual amounts included in Cost Recovery Deferral – Conservation cannot be specifically allocated by customer class; therefore, the requested information cannot be provided. The Company observes that its Conservation and Demand Management programs have delivered approximately \$180.3 million in bill savings and \$180.0 million in reduced system costs for Newfoundland Power customers from 2009 to 2022.4

c) i) In Order No. P.U. 3 (2025), the Board approved an overall average customer rate increase of 7.0% effective July 1, 2025, which included an average increase for domestic customer rates of 7.1%.5 The overall forecast average customer

In Order No. P.U. 13 (2009), the Board approved the deferred recovery of certain forecast 2009 conservation costs. In Order No. P.U. 13 (2013), the Board approved the deferral of annual customer energy conservation

In Order No. P.U. 13 (2013), the Board approved the amortization of annual customer energy conservation program cost over a 7-year period with recovery through the Rate Stabilization Account. In Order No. P.U. 3 (2022), the Board approved the change in the amortization period from 7 to 10 years, effective January 1, 2021.

For example, the implementation of Order No. P.U. 3 (2022) resulted in revised balances for annual deferred customer energy conservation program costs incurred up to December 31, 2021.

See the response to Request for Information CA-NP-006 in the Company's 2025/2026 General Rate Application.

See Approval of Compliance with Order No. P.U. 3 (2025) and Customer Rates, Rules and Regulations, effective July 1, 2025, Schedule 2, Appendix G, line 5.

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1 2	rate increase is 7.0% effective July 1, 2026, based on the Company's current approach to customer rate smoothing. ⁶
3	, , , , , , , , , , , , , , , , , , ,
4	ii) In general, as electricity rates increase customer energy usage will decrease. The
5	elasticity impacts considered in the 2025/2026 General Rate Application and
6	reflected in current customer rates were 16.2 GWh and 48.0 GWh for 2025 and
7	2026 respectively ⁷

See Approval of Compliance with Order No. P.U. 3 (2025) and Customer Rates, Rules and Regulations, effective July 1, 2025, Schedule 2, page 8, Table 4.

⁷ See the response to Request for Information NLH-NP-080 in the Company's *2025/2026 General Rate Application*.

ATTACHMENT A:

Newfoundland Power Inc. Cost Recovery Deferral - Conservation 2009 through 2025 Forecast

Newfoundland Power Inc. Cost Recovery Deferral - Conservation 2009 through 2025 Forecast

	2009 ¹	2010	2011	2012	2013 ²	2014	2015	2016	2017	2018	2019 ³	2020	2021	2022	2023	2024	2025F
Balance, January 1 st		948	682	454	227	2,085	4,937	7,463	11,304	14,116	15,784	17,371	17,049	16,421	19,359	20,708	21,280
Implementation True-Up ⁴	,								,					1,875			,
Cost	948				2,085	3,150	3,274	5,040	4,731	4,367	4,805	3,583	3,494	3,659	4,311	3,966	4,514
Amortization	•	(566)	(228)	(227)	(227)	(298)	(748)	(1,199)	(1,919)	(2,594)	(3,218)	(3,905)	(4,122)	(2,596)	(2,962)	(3,394)	(3,680)
Balance, December 31st	948	682	454	227	2,085	4,937	7,463	11,304	14,116	15,889	17,371	17,049	16,421	19,359	20,708	21,280	22,114
Components of Cost ⁵																	
	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019 1	2020	2021	2022	2023	2024	2025F
Labour					491	674	624	269	867	863	807	818	774	771	968	920	1,082
Non-Labour	1				707	1,225	899	1,294	1,778	1,592	2,029	1,245	1,564	1,768	2,244	1,938	1,833
Incentives	,				887	1,251	1,751	2,977	2,086	1,912	1,969	1,520	1,156	1,120	1,171	1,078	1,599
Total	•				2,085	3,150	3,274	5,040	4,731	4,367	4,805	3,583	3,494	3,659	4,311	3,966	4,514

In Order No. P.U. 13 (2009), the Board approved the creation of a Conservation Cost Deferral Account and deferred recovery of certain costs related to the implementation of the conservation plan in 2009. In Order No. P.U. 43 (2009), the Board approved the 4-year amortization of the implementation costs.

In Order No. P.U. 13 (2013), the Board approved the deferral of annual customer energy conservation program costs.

The opening balance for 2019 has been adjusted to reflect a 30% corporate income tax rate. This is consistent with the deferred tax treatment required for financial reporting purposes in 2019.

Implementation of Order No. P.U. 3 (2022) resulted in revised balances for annual deferred customer energy conservation program costs incurred up to December 31, 2021.

⁵ Amounts are shown an an after-tax basis.