Q. Reference: "2026 Capital Budget Application," Newfoundland Power Inc., June 27, 2025, 2026 Capital Budget Overview, sec. 2.3.4., p.11, Table 3.

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Please provide a table comparing the average amount of capital investment per kilometer of transmission and distribution line owned and operated by each of Nova Scotia Power, New Brunswick Power, Maritime Electric, and Newfoundland Power for the years 2014 and 2023, presented similar to Table 3.

A. Newfoundland Power does not have the data readily available to provide the information requested. Further, as provided in the 2026 Capital Budget Overview, New Brunswick Power ("NB Power") changed accounting standards in 2016. Due to this change, the Company is unable to compare NB Power's 2014 and 2023 capital investment.

The information in Table 3 in Newfoundland Power's 2026 Capital Budget Application, 2026 Capital Budget Overview is based on the audited financial statements of each utility. The audited financial statements do not include kilometers of transmission and distribution line. The Company also notes that Maritime Electric's audited financial statements are not publicly available. As a result, Newfoundland Power is not authorized to reproduce information from Maritime Electric's audited financial statements in a disaggregated form. In addition, between 2014 and 2023, Newfoundland Power changed its methodology for determining its distribution and transmission line lengths and is therefore unable to provide the requested comparison.

See Newfoundland Power's 2026 Capital Budget Overview, Section 2.3.4, page 11, footnote 27. Newfoundland Power can provide that NB Power's property, plant and equipment relating to Transmission and Distribution ("T&D") assets increased by approximately 46% from 2016 to 2023. By comparison, Newfoundland Power's T&D assets increased by approximately 33% over the same period.