1Q.In reference to the evidence of Barry Perry, please advise if Mr. Perry is an expert2on the automatic adjustment formula and if it is the Company's intention that he3testify as an expert on the automatic adjustment formula.

- A. While Dr. Morin and Ms. McShane are considered to be expert witnesses in this area,
 Mr. Perry is Newfoundland Power's Vice President of Finance and Chief Financial
 Officer and in that capacity is responsible for maintaining the creditworthiness and
 financial integrity of the Company.
- 10 Decisions surrounding the issue of the automatic adjustment formula are central to the 11 determination of the Company's financial integrity and creditworthiness. Mr. Perry's 12 testimony in this area is necessary in providing an adequate understanding of the impact 13 on Newfoundland Power of decisions regarding the automatic adjustment formula.