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1Q.In reference to the evidence of Barry Perry, please advise if Mr. Perry is an expert2on business risk assessment and if it is the intention of the Company that he testify3as an expert on business risk assessment.

- A. An assessment of business risk is central to determining an appropriate return on equity
 and capital structure. Dr. Morin and Ms. McShane are expert witnesses testifying in
 these areas.
- 9 Mr. Perry is Newfoundland Power's Vice President of Finance and Chief Financial 10 Officer and in that capacity is responsible for maintaining the creditworthiness and 11 financial integrity of the Company. Both creditworthiness and financial integrity can be 12 significantly impacted by the Company's business risk assessment, capital structure and 13 return on equity. Mr. Perry's testimony in this area is necessary in providing an adequate 14 understanding of the impact on Newfoundland Power of decisions regarding the 15 Company's business risk, capital structure and return on equity.