

1 **Q. In reference to the evidence of Barry Perry, please advise if Mr. Perry is expert on**
2 **capital structure and if it is the intention of the Company that he testify as an expert**
3 **on capital structure.**
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5 A. Dr. Morin and Ms. McShane are considered to be expert witnesses in the area of capital
6 structure. Mr. Perry is Newfoundland Power's Vice President of Finance and Chief
7 Financial Officer and in that capacity is responsible for maintaining the creditworthiness
8 and financial integrity of the Company.
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10 Capital structure can have a major effect on the Company's financial integrity and
11 creditworthiness. Mr. Perry's testimony in this area is necessary in providing an
12 adequate understanding of the impact on Newfoundland Power of decisions regarding the
13 Company's capital structure.