1 2 3	Q.	Would maintaining its long-standing practice of using beginning-of-the-year depreciation impose undue or higher accounting costs on Newfoundland Power?
4		Newfoundland Power's continued use of the full-year depreciation convention would not
5		impose undue or higher accounting costs on the Company.
6		
7		As noted on Page 33 of Grant Thornton's 2001 Annual Financial Review of
8		Newfoundland Power Inc., "This change resulted in a decrease in depreciation expense of
9		approximately \$864,000, which is a benefit to the consumer." For the 2003 test year,
10		application of the mid-year convention results in a reduction in the Company's revenue
11		requirement of approximately \$675,000, which again represents a benefit to the
12		consumer.
13		
14		Gannett Fleming is not aware of any utility that does not use the mid-year or half-year
15		convention (or a similar derivation thereof) for purposes of calculating book deprec
16		
17		Gannett Fleming recommends that Newfoundland Power switch to the mid-year
18	more representative of the	convention for purposes of calculating book depreciation since this accounting practice is
19		more representative of the assumption that all plant added (or retired) during the calendar
20		year was installed (or removed), on average, on July 1. Gannett Fleming's recommendation is also based on the fact that the mid-year convention is consistent with accounting practice used by other electric utilities.
21		
22		
23		
24		Please refer to the Company's response to Request for Information CA-582 for additional
25		information and references with respect to the mid-year convention.