

- Q. At p. 12, line 6, Dr. Kalymon refers to “special deals with respect to poles”. Please identify each special deal referred to, including when each special deal is said to have occurred.
- A. **The special deals referred to in Dr. Kalymon’s testimony refers to the acquisition of joint use telephone poles by Newfoundland Power which resulted in revenue gains unrecognized in the previous hearing. The specific timing of these deals and when they were actually first contemplated or negotiated is not know to Dr. Kalymon.**