- Q. At page 67 it is stated that the Company proposes to change the valuation of pension assets using a market related method "on a prospective basis rather than a retroactive basis." Please provide detailed calculations showing how results would change under a retroactive change.
- A. Adoption of the market-related method of valuing pension assets in determining pension expense, if applied on a retroactive basis since 2000, would not change the proposed forecast of pension expense for either 2003 or 2004. The retroactive application of the market-related valuation method would only result in a cumulative increase in pension expense to the end of 2002 of approximately \$215,000, with a corresponding decrease of \$215,000 in the Company's retained earnings as of December 31, 2002.

On page 8 of the report by JTBrowne Consulting entitled *Newfoundland Power*, *Accounting and Regulatory Issues Related to Future Employee Benefits and the Hydro Production Equalization Reserve* filed with the Company's 2003 General Rate Application on October 11, 2002, Mr. Browne states that:

"Should the Board accept NP's proposed change, it should be applied on a prospective basis as proposed by NP. Consistent with the cost of service standard, all changes in accounting policy should be applied prospectively for rate setting purposes. This is required if a regulated enterprise is to have a reasonable opportunity to recover its costs of providing service, and not have an opportunity to recover costs twice."

Newfoundland Power proposes to prospectively adopt the market-related method of valuing pension assets in determining pension expense beginning on January 1, 2003. As shown in Table 18 on page 66 of the *Finance & Accounting Evidence*, the net impact of adopting this policy will be a \$1.2 million reduction in forecast pension expense for 2003 and a \$0.2 million reduction in forecast pension expense for 2004.