Q. RATE BASE

PUB 37.0 (RE: Report on the Amortization of the Unfunded Pension Liability – Volume I)

PUB 37.1

Confirm that although under current Provincial pension legislation unfunded pension liabilities can be amortized over a period of 15 years, NP continues to use a 5 year period to amortize its unfunded pension liability.

A. Newfoundland Power does not *use* a 5-year period to amortize its unfunded pension liability. The amortization used is effectively the end of an approximately 25 year funding program that has been authorized by the Board, applied to the current unfunded pension liability.

The amount of Newfoundland Power's special pension funding payments which are made to liquidate the unfunded pension liability are principally the result of a series of amortizations approved by the Board. The amounts of the amortizations are set out on page 4 of the letter from Mercer Human Resource Consulting, filed as Appendix A of the *Report on the Amortization of the Unfunded Pension Liability*, (the "Mercer letter").

The results of the most recent valuation indicate, as at December 31, 2003, that there remained a going concern unfunded liability of \$24.1 million. As explained in Mercer letter, the present value of the current schedule of Board authorized special payments is approximately \$26.8 million, or \$2.7 million greater than the unfunded liability. Mercer adjusted the amortization payments in the most distant future so that the present value of the revised schedule of payments equals the going concern unfunded liability. This effectively results in an amortization period which is expected to be completed on July 31, 2008.

The July 31, 2008 completion is sooner than initially anticipated. The \$4,188,000 annual payment approved by the Board in 1984 was originally expected to conclude on March 31, 2009. The \$521,000 annual payment approved by the Board in 1999 was initially expected to conclude on January 31, 2010.

Accordingly, the unfunded pension liability is currently expected to be fully amortized by July 31, 2008, which is in approximately 4 ½ years.