Q. In the financial statements filed in Exhibits NP-14 and NP-15, NP has provided forecast figures for 2005 and 2006 as a means of evaluating the effect that its proposed changes would have on the financial performance of the Company. Since these forecast figures differ from the 2004 test year, what argument does NP put before the Board in support of using these forecast figures, in the absence of a full review of the revenue requirement, to make a determination on this Application?

A. A review of revenue requirements is completed within the context of a general rate hearing for the purpose of adjusting customer rates. In the 2006 Accounting Policy Application, Newfoundland Power is not requesting a change in customer rates. A review of revenue requirements is therefore not required to make a determination on the 2006 Accounting Policy Application.

In the 2006 Accounting Policy Application, Newfoundland Power is proposing a change in accounting policy that will make it consistent with other Canadian utilities. The Company is also proposing that an accounting accrual be used to offset a forecast 2006 revenue shortfall resulting from increased depreciation expense and income tax effects in that year. The Company has provided forecast financial results in Exhibits NP-14 and NP-15 to demonstrate to the Board the overall effect, and reasonableness, of the Company's proposals.

The Board's reliance on forecasts to assist in determining reasonableness of proposals before it is common.

The Board has previously approved accounting policy changes for Newfoundland Power without the complexity of a general rate hearing or a full review of forecast costs; most notably, approval of the incremental method of determining General Expenses Capital ("GEC") in Order No. P.U. 3 (1995-96). In making a determination on the GEC application, the Board assessed the reasonableness of the Company's accounting policy proposals based on financial forecasts as presented, and given that the Company indicated a general rate proceeding was expected in 1996.

The Board has also noted the benefits of having authority to approve changes in forecasts, such as the forecast values of rate base and invested capital which are approved outside the context of a full cost of capital hearing or general rate application. In Order No. P.U. 36 (1998-99), the Board stated that if test year values for the Automatic Adjustment Formula (the "Formula") became inappropriate, the Board will adjust them after hearing evidence at a capital budget hearing, a hearing pursuant to section 91 of the *Public Utilities Act*, or any other hearing where evidence can be taken as to the need for adjustments to any of the dependent variables in the Formula.

In summary, forecasts are routinely relied upon by the Board to assist in determining the reasonableness of proposals before it. Exhibits NP-14 and NP-15 have been provided with the 2006 Accounting Policy Application for this purpose.