DECISION

IN THE MATTER OF an Application by New Brunswick Power Corporation pursuant to subsection 103(1) of the *Electricity Act*, S.N.B. 2013, c. 7, for approval of the schedules of rates for the fiscal year commencing April 1, 2017.

(Matter No. 336)

June 14, 2017

NEW BRUNSWICK ENERGY AND UTILITIES BOARD

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NEW BRUNSWICK ENERGY AND UTILITIES BOARD:

Vice-Chairperson:	François Beaulieu
Members:	Michael Costello
	Patrick Ervin
	John Patrick Herron
Counsel:	Ellen Desmond, Q.C.
Chief Clerk:	Kathleen Mitchell

APPLICANT:

New Brunswick Power Corporation:	John Furey

INTERVENERS:

Enbridge Gas New Brunswick Inc.:	Shivani Chopra
Green Party of New Brunswick:	Margo Sheppard
Gregory Hickey	

INTERVENERS: (cont.)

J.D. Irving, Limited:	Christopher Stewart
New Clear Free Solutions:	Chris Rouse
Utilities Municipal:	Scott Stoll
Public Intervener:	Heather Black

A. Introduction

[1] The New Brunswick Power Corporation (NB Power) applied to the New Brunswick Energy and Utilities Board (Board) on October 4, 2016, for an order approving the schedules of rates it proposed to charge for its services for the fiscal year commencing on April 1, 2017 (test year). In addition, NB Power requested an extension of the term of the Petroleos de Venezuela, S.A. (PDVSA) regulatory deferral account, because of the extension of the economic life of the Coleson Cove plant.

[2] The Board scheduled a public session in Fredericton on the evening of January 24, 2017, to receive comments from the public in relation to the application. Five presentations were made, and the Board received three written submissions. During the hearing, Board staff requested and received comments from NB Power witnesses regarding the public submissions made during the session. The Board encourages participation by members of the public, and it has considered the presentations and letters of comment in this matter.

[3] The hearing took place in Fredericton between February 20 and 24, 2017. In addition to the pre-filed evidence, NB Power presented five witness panels for cross-examination. Two expert witnesses presented evidence on behalf of NB Power. Mr. John Todd of Elenchus Research Associates Inc. (Elenchus) was qualified in the area of regulation of electric and gas utilities. Mr. James Stephens of ScottMadden Inc. (ScottMadden) was qualified in the area of operations of energy markets and risk management in such markets.

[4] Two interveners filed evidence in this matter. The Public Intervener filed the evidence of Mr. Robert Knecht, who was qualified as an expert in the areas of regulatory economics and rate making. New Clear Free Solutions filed the evidence of Mr. Chris Rouse. The other interveners who are listed above participated in the hearing, but did not file evidence.

[5] The Board issued an oral partial decision on this matter on March 27, 2017, in which it approved revenue requirements of $1,720.9 million, a reduction of $4.7 million from the revenue requirements in the application. NB Power was required to provide its calculation of revised uniform and differential rate increases for its customer classes, as well as revised proposed schedules of rates. These were provided to the Board on March 29.

[6] On March 30, the Board issued a second partial decision approving a uniform rate increase of 1.77% for all customer classes except the Residential and General Service I

(GS I) classes. Increases of 2.07% and 0.80% were approved for the Residential and GS I classes, respectively. The Board approved the schedules of rates to take effect on April 1, 2017.

B. Legislative Framework

[7] NB Power is required under the *Electricity Act*, S.N.B. 2013, c.7 (Act) to apply to the Board for approval of its rates for each fiscal year. The application must include NB Power's projection of its load and revenue, its revenue requirements and its proposed schedules of rates. If satisfied that the rates are just and reasonable, the Board will approve the rates, or it will fix other rates that it finds to be just and reasonable.

[8] In considering the application, the following provisions of the Act are of particular relevance:

> **Rates**
>
> **103**(7) In approving or fixing just and reasonable rates, the Board shall base its order or decision on the Corporation's revenue requirements, taking into consideration
>
> *(a)* the policy set out in section 68,
>
> *(b)* the most recent integrated resource plan approved or deemed to be approved by the Executive Council under section 100,
>
> *(c)* the most recent strategic, financial and capital investment plan filed with the Board under section 101,
>
> *(d)* any requirements imposed by law on the Corporation that may be relevant to the application, including, without limitation, requirements regarding demand-side management and energy efficiency plans and renewable energy requirements,
>
> *(e)* any directive issued by the Executive Council under section 69 that may be relevant to the application, and
>
> *(f)* any policy established by a regulation made under paragraph 142(1)*(f)* that may be relevant to the application.
>
> **103**(8) In approving or fixing just and reasonable rates, the Board may take into consideration

(a) accounting and financial policies of the Corporation,

(b) matters of cost allocation and rate design,

(c) customer service related charges,

(d) the Corporation's demand-side management and energy efficiency plans, and

(e) any other factors that the Board considers relevant.

[9] Section 68, as cited in paragraph 103(7)*(a)* states:

Electricity policy of the government

68 It is declared to be the policy of the Government of New Brunswick:

(a) that the rates charged by the Corporation for sales of electricity within the Province

(i) should be established on the basis of annually forecasted costs for the supply, transmission and distribution of the electricity, and

(ii) should provide sufficient revenue to the Corporation to permit it to earn a just and reasonable return, in the context of the Corporation's objective to earn sufficient income to achieve a capital structure of at least 20% equity,

(b) that all the Corporation's sources and facilities for the supply, transmission and distribution of electricity within the Province should be managed and operated in a manner that is consistent with reliable, safe and economically sustainable service and that will

(i) result in the most efficient supply, transmission and distribution of electricity,

(ii) result in consumers in the Province having equitable access to a secure supply of electricity, and

(iii) result in the lowest cost of service to consumers in the Province, and

(c) that, consistent with the policy objectives set out in paragraphs *(a)* and *(b)* and to the extent practicable, rates charged by the Corporation for sales of electricity within the Province shall be maintained as low as

possible and changes in rates shall be stable and predictable from year to year.

C. Analysis

[10] This decision sets out the reasons for the Board’s partial decisions of March 27 and March 30, 2017, which approved the revenue requirements for the test year and differential rates for two customer classes, and approved updated schedules of rates. The extension of the term of the PDVSA regulatory deferral account and other issues are also addressed below.

[11] NB Power’s application was based on budgeted revenue requirements for the test year of $1,725.6 million. In order to achieve the full revenue requirements, it requested an average two percent rate increase, effective April 1, 2017. According to NB Power, the application was made in the context of two significant factors: its operating variability and debt reduction, and the then-pending Mactaquac decision and its impact on progress made on debt reduction.

1. Load Forecast

[12] NB Power filed its load forecast for in-province customer requirements for the period 2017-2027. The load forecast is based on an analysis of past loads and trends, using data gathered through customer surveys and assessments of economic, demographic, technological and other factors affecting the utilization of electrical energy. The load forecast incorporates key assumptions, none of which were challenged.

[13] NB Power has made efforts to improve its forecasting models. The Board’s decision of October 28, 2015 (Matter 272) referred to nine action items identified in a 2007 audit by GDS Associates (GDS). Most of the items had been completed or mostly completed.

[14] One outstanding item relates to short-term forecasting models. The GDS audit suggested that short-term models may provide more accurate forecasts than annual models based on an extended history. NB Power agreed to participate in a working group to explore any unresolved issues related to load forecasting.

[15] In its decision of July 21, 2016 (Matter 307), the Board directed NB Power to submit an update on its progress and recommendations from the working group. The current application states that the outstanding items remain a work in progress.

[16] The Board directs NB Power to update its progress in relation to the outstanding and incomplete audit action items no later than the next general rate application. If a specific working group recommendation is not forthcoming in relation to the outstanding audit item at that time, the Board requires an estimated completion date and work plan.

[17] The forecasted in-province energy supply for the test year is 14,112 gigawatt hours (GWh), a slight decrease from the estimated supply for the previous year. Forecasted annual peak hour demand for the test year is 3,060 megawatts (MW), a decrease of 20 MW from the estimate for 2016/17. Estimates of the impacts of NB Power's Reduce and Shift Demand programs, based on the current Demand Side Management Plan, are built into the load forecast.

[18] The Board accepts the load forecast as filed.

2. Revenue Requirements

[19] NB Power submitted its budgeted revenue requirements, consisting of the following:

Items	Budgeted Revenue Requirements
(1) Fuel and purchased power expense	$639.5 million
(2) Operations, maintenance and administration	$468.4 million
(3) Depreciation and amortization	$250.6 million
(4) Taxes	$44.3 million
(5) Finance costs and other income	$220.9 million
(6) Net change in regulatory balances	$11.4 million
(7) Net earnings	$90.6 million
(8) Total revenue requirements	$1,725.6 million

[20] The Board adjusted, in its oral partial decision of March 27, the Fuel and Purchased Power expense, as reviewed below. The Board approved revenue requirements of $1,720.9 million for the test year.

[21] The above table amounts are as found in the final version of NB Power's evidence in this proceeding. Shortly before the hearing however, NB Power explained that certain items were revised in the process of finalizing NB Power's 10-Year Plan, Fiscal Years 2018 to 2027 (10-Year Plan).

[22] These revisions are not reflected in the amounts shown above, but are reconciled as part of the Erratum filed on February 7, 2017. This reconciliation indicates that the revised expenses and operating earnings would result in net earnings of $66.7 million. These reasons for decision refer to the amounts shown in the table above, recognizing that adjustments were made shortly before the hearing commenced, which impacted both Operations, Maintenance and Administration (OM&A) and net earnings.

a. Fuel and Purchased Power Expense

[23] NB Power forecasts the fuel and purchased power expense to be $639.5 million for the test year. This includes $188.6 million for fuel including heavy fuel oil, nuclear, and imported coal. Purchased power is forecast to be $450.9 million. NB Power relies on the PROMOD modeling/costing program to derive forecasted fuel and purchased power costs.

[24] There were no intervener challenges to the fuel and purchased power cost forecasts, with the exception of the Large Industrial Renewable Energy Purchase Program (LIREPP). Mr. Gregory Hickey submitted that the Board should be concerned about LIREPP purchases. LIREPP is mandated by the *Electricity from Renewable Resources Regulation – Electricity Act*, N.B. Reg. 2015-60 (Regulation). There was no suggestion that LIREPP purchases by NB Power are not in accordance with the Regulation.

[25] In its oral partial decision of March 27, the Board reduced the revenue requirements, based on what the Board finds to be a miscalculation by NB Power of the LIREPP cost. This was identified during cross-examination by Board staff.

[26] NB Power used a LIREPP discount rate for 2016/17 of 15.0%, when in fact the actual discount for that year was 12.1%. A second input to the calculation was the rate increase approved by the Board for 2016/17, which became effective in July 2016. NB Power used 2% as the input, whereas the Board had approved a rate increase of 1.66%. With these corrections, the revenue requirements were reduced by $4.7 million for the test year.

b. Operations, Maintenance and Administration Expense

[27] NB Power's proposed OM&A expense totals $468.4 million. In its partial oral decision of March 27, the Board made no reductions to the OM&A test year budget.

c. Depreciation and Amortization

[28] Depreciation and Amortization expenses are budgeted to be $250.6 million for the test year, a decrease of $15.4 million from the 2016/17 approved budget. NB Power attributes part of this variance to life extensions of the Belledune and Coleson Cove generating plants. Based on 2016 internal engineering reports, the depreciable lives of those plants were extended to 2040. This reduces annual depreciation expenses and improves NB Power's income.

[29] NB Power states that the introduction of International Financial Reporting Standards required an annual assessment of plant life estimates, and that amortization periods be consistent with such estimates. NB Power's external auditors found that the consolidated financial statements as of March 2016, which incorporated the amortization periods, were presented fairly.

[30] Mr. Knecht recommended deferring the depreciation changes until there are more details about the implementation of federally imposed carbon pricing and the elimination of coal-fired generation. He acknowledged however, during cross-examination, that this would require a depreciation account for regulatory purposes, which he did not recommend.

[31] In final argument, NB Power stressed that it is premature to make any assumptions about how the provincial government will implement the federal carbon plan. It submitted that the province's Climate Change Action Plan foresees the introduction of climate change legislation, following stakeholder consultations. In relation to the elimination of coal generation, it stated that there may be alternatives, such as seasonal operation, that could achieve targeted emissions without the early closure of Belledune.

[32] The Board agrees that NB Power's depreciation changes are consistent with current accounting methods. This issue may be considered in future proceedings, after more is known about plans to implement carbon pricing and the future of coal-based generation.

d. Net Change in Regulatory Balances

[33] The Board approved the establishment of a regulatory deferral account in its decision of August 23, 2007, relating to the PDVSA settlement. Its purpose is to account for the savings realized from a lawsuit settlement with PDVSA over the life of the Coleson Cove plant (23 years at that time), and to provide the benefit of such savings to customers on a levelized basis over the period of the settlement terms (17 years).

[34] In its application, NB Power requested an extension of the term of the PDVSA regulatory deferral account, because of the extension of the economic life of the Coleson Cove plant. This would result in extending the benefits of the settlement over a longer period. Such an extension requires a variance of the PDVSA decision.

[35] The Board approves NB Power's request. The PDVSA decision is varied to extend the settlement credits associated with the PDVSA settlement over the current economic life of the Coleson Cove plant.

3. Differential Rate Increases

[36] NB Power's application proposed differential rate increases in order to improve the revenue-to-cost ratios (RCR) for the Residential and GS I customer classes. In its decision of May 13, 2016 (Matter 271), the Board reaffirmed that a RCR within a range of 0.95 to 1.05 is reasonable. The Residential class RCR is below the range of reasonableness, and the GS I class is above.

[37] To improve the RCR for each of those classes, NB Power proposed a rate increase for the GS I Class of 0.90%, and an increase of 2.33% for the Residential class. NB Power estimates that differential rates on this basis will gradually move these classes to within the range of reasonableness within ten years, subject to variations in cost allocation methodologies, rate design or load changes.

[38] In its oral partial decision of March 27, the Board approved the differential rate increases, using the approach described in the application. The second partial decision of March 30 approved rate increases of 0.80% for the GS I class, and 2.07% for the Residential class. All other classes are within the range of reasonableness. The Board approved a uniform rate increase of 1.77% to those other classes.

[39] NB Power indicated that the number of years to achieve a range of reasonableness for GS I and Residential rates could be addressed in a rate design review. The Board will consider this in the rate design application that NB Power filed on May 1.

D. Other Issues

1. Class Cost Allocation Study

[40] In Matter 271, the Board approved NB Power's Class Cost Allocation Study (CCAS) methodology, subject to certain modifications. NB Power was required to file a revised CCAS methodology, including the modifications, with the current application.

[41] In the current application, NB Power proposed two changes, not considered in Matter 271, to the methodology. First, it proposed to allocate energy efficiency program costs to reflect the equal sharing of the program benefits between customers and the entire electricity system. Second, it proposed to separately assign production and transmission taxes to their respective functions, rather than based on fully allocated plant values.

[42] NB Power was also ordered in Matter 271 to include two CCAS studies in the current application. These related to load estimates and coincident factors, and to the sub-functionalization of distribution assets. Elenchus prepared these studies, which were accepted by NB Power and filed as evidence.

[43] NB Power filed a recommended CCAS model with its application. It incorporates the revised CCAS methodology, including the two changes referred to above, as well as the recommendations of the Elenchus studies.

[44] Mr. Knecht and Utilities Municipal raised certain issues in relation to the recommended CCAS model. They agreed that the issues could be included in an ongoing stakeholder consultation, and considered by the Board as part of the 2018/19 general rate application. None of the parties at the hearing objected to this approach.

[45] The Board accepts NB Power’s recommended CCAS model and will consider any additional issues as part of the 2018/19 general rate application.

2. Continuous Improvement

[46] NB Power stated that cost efficiencies and productivity improvements are an integral part of its business objectives. These efficiencies and improvements are aimed at keeping rates low and stable for customers, considering the policy objectives described in the Act.

[47] The 10-Year Plan decreased the continuous improvement target in the period 2018 to 2027 by $211 million, compared to the previous plan. Ms. Clark testified that savings are taking longer to materialize than what was originally anticipated.

[48] Mr. Stewart, counsel for J.D. Irving, Limited, argued that NB Power has an obligation to its ratepayers to control its costs. Mr. Stoll, counsel for Utilities Municipal, supported and encouraged NB Power to find efficiencies and to continue to improve its operations. However, he noted that “any approach to cost cutting should seriously be reviewed so that short-term improvements in the debt to equity ratio are not given preeminence over having a healthy company in the long term.”

[49] The Board agrees that NB Power must continue to focus on continuous improvement initiatives to increase productivity and reduce costs.

3. Rate Adjustment Mechanism

[50] Some elements of NB Power's operations are outside of its control. These can cause large variances between its approved and actual revenue requirements. Sources of operating variability include natural gas prices, low hydro flows, and the loss of industrial and out-of-province loads. NB Power states that inherent variability has resulted in its net debt reduction plans being slower than expected.

[51] In the evidence filed by the Public Intervener, Mr. Knecht suggested that a short-term adjustment mechanism should be considered to allow for recovery of variability impacts. Mr. Todd, during his testimony, supported the idea of an adjustment mechanism to recover uncontrolled variances over a short time frame. In his opinion, this would be more automatic and transparent than the current rate regime.

[52] NB Power supports an adjustment mechanism to address the impact of variances, to ensure that NB Power achieves full cost recovery in the face of asymmetric risks. NB Power stated its intention to file a rate adjustment proposal in advance of the 2018/19 general rate application, if possible, or with that application.

4. Financial Risk Management Policies

[53] In Matter 272, the Board ordered NB Power to submit a proposal for the scope and timing of an external audit to measure compliance and effectiveness of the financial risk management policies (FRM policies) for both New Brunswick Energy Marketing Corporation (Marketing Corporation) and NB Power. This was filed on April 27, 2016, and deals with compliance audits and effectiveness reviews separately.

[54] NB Power proposes a biennial internal compliance audit for NB Power and Marketing Corporation, beginning with the period April 2015 to March 2017, to be filed as part of the general rate application for 2018/19.

[55] The proposal to review FRM policy effectiveness focuses on the hedging program and its design, monitoring, reporting and governance. NB Power filed a report by ScottMadden as evidence in the current application. The report evaluates the effectiveness of the FRM policies for NB Power and Marketing Corporation. It concludes that the FRM policies are appropriate and contribute to meeting the FRM policies' objectives.

[56] The Board directs NB Power to file compliance audits for both NB Power and Marketing Corporation with the general rate application for 2018/19.

[57] In the current application, NB Power reported (a) an exception to the Marketing Corporation Commodity Price & Foreign Exchange Risk Policy and (b) an exception to the NB Power Commodity Price & Foreign Exchange / Interest Rate Risk Policy. These exceptions were approved by NB Power's Board of Directors in February 2016.

[58] Finally, NB Power requested that the Board approve a change to the NB Power Commodity Price & Foreign Exchange / Interest Rate Risk Policy, as was approved by the NB Power Board of Directors in April 2016. A copy of the revised policy was filed as evidence in the current application. There was no objection from any party to the revised policy. The Board approves the revised policy, as filed.

E. Approval of Rates

[59] In the Board's oral partial decision and second partial decision, NB Power's budgeted revenue requirements were reduced by $4.7 million. A uniform rate increase of 1.77 % was fixed for all customer classes except the Residential and GS I classes. Increases of 2.07% and 0.80% were fixed for the Residential and GS I classes, respectively.

[60] The time at which the rates were to take effect was set as April 1, 2017.

Dated in Saint John, New Brunswick, this 14th day of June, 2017.

François Beaulieu
Vice-Chairperson

Michael Costello
Member

Patrick Ervin
Member

CONCURRING REASONS OF MEMBER HERRON

[1] I concur with the decision of the Board. I agree with the outcome and with the reasons offered above. However, I would have included the following reasons in the decision.

1. The Equity Goal and Capital Structure

[2] In the Board's decision in relation to the 2015/16 rate application (Matter 272), NB Power was directed "to provide evidence in its next rate application that addresses an appropriate capital structure for the long term" (para. 124). This requirement was varied in Matter 307 to allow compliance in the current rate application.

[3] A report prepared by Mr. John Todd of Elenchus Research Associates Inc. (Elenchus Report) recommends guidelines in relation to the capital structure, for the purposes of setting rates each year. First, the report states that the legislated 20% target should be seen as the minimum level to allow NB Power to absorb risks without requiring excessive rate increases. Second, equal annual rate increases provide the greatest likelihood that future increases will be low and stable despite year-to-year variances. Third, to address exceptional capital requirements, short-term increases should be considered to maintain the minimum 20% equity in the long term. Fourth, interim targets above the 20% goal will likely be required in anticipation of major capital requirements, in order to maintain a minimum of 20% equity over the long term. Finally, Mr. Todd states that progress towards the 20% target will not be constant, due to cyclical cost and revenue variances.

[4] In his testimony, Mr. Todd described the need for a flat rate trajectory to provide sufficient net earnings to achieve the target equity over time. The target achievement date, in Mr. Todd's view, is guided by the anticipation of significant capital requirements, as set out in the 10-Year Plan.

[5] According to the 10-Year Plan, the 20% target would be achieved in fiscal 2023-2024. By the year ending in 2027, equity would be 28%, although spending variances on the end of life option for the Mactaquac Generating Station (Mactaquac) could affect this outcome. This would be achieved, according to the plan, with two percent average rate increases for the test year and the three subsequent fiscal years, followed by one percent average increases for the six remaining years.

[6] Mr. Knecht, in his report (the Knecht Report) filed by the Public Intervener, agreed with a number of the conclusions set out in the Elenchus Report. Mr. Knecht agreed that NB Power "should make annual progress toward increasing equity and that reaching a

20 percent equity share of capital should be achieved ‘without unnecessary delay’”. He stated that annual equity ratio increases should be sufficient to absorb normal fluctuations in income without resulting in a decline in NB Power’s equity ratio. He agreed that in order to maintain a minimum 20% equity share, while maintaining the legislative objective of stable rates, NB Power should accrue an “equity ‘buffer’ prior to the onset of major capital projects” - citing the current context of the pending refurbishment of the Mactaquac dam.

[7] The Knecht Report also agreed that the rate trajectory should not indicate higher increases in future years that exceed the percentage increase in the test year.

[8] The Knecht Report provided a further observation, that neither the legislation nor the Elenchus Report provided specifics for when the legislated 20% equity share of capital should be achieved. The Knecht Report did suggest that “the Board should look for ways to establish a firmer target date for achieving that legislated requirement.”

[9] None of the parties challenged the need to achieve a minimum 20% equity structure within a reasonable time frame, in order to provide NB Power with the ability to fund major capital projects.

[10] As stated above, the Elenchus Report, and the response to it by Mr. Knecht, were a result of a directive of the Board. In addition, the hearing included a dedicated panel offered by NB Power with respect to the Elenchus Report, where Mr. Todd was the expert witness.

[11] I depart from my colleagues in that, I find it to be reasonable that the Board should convey in this decision its interpretation of the observations found in both the Elenchus and the Knecht reports.

[12] Based on the evidence and testimony before the Board in this matter, I agree with conclusions found in the Elenchus Report and with those found in the Knecht Report related to capital structure. Specifically:

- I agree that the goal of attaining the legislated 20% objective is the minimum level necessary to allow NB Power to avoid risks due to income fluctuations that could result in excessive rate increases that conflict with the multiple legislated rate objectives found in section 68 of the Act, which states that rates should be as low, stable and predictable as possible.

- I agree that rates should be sufficient to attain annual progress towards achieving the legislated 20% equity objective as quickly as possible to mitigate excess risk exposure to higher rates in the future.

- I agree that the rate trajectory must provide sufficient net earnings to achieve the legislated equity over time. In addition, the trajectory should not indicate higher increases in future years that exceed the percentage increase in the test year.

- I agree with the Elenchus Report which states: "While it must be assumed that unanticipated developments will cause actual future rate increase to deviate from the planned trajectory, equal annual rate increases provide the greatest likelihood that future rate increases will be low and stable despite the inevitable year-by-year variances."

- I find that appropriate interim targets above the legislated 20% goal are required in anticipation of major capital requirements, in order to maintain a minimum of 20% equity over the long term.

- I note that the legislation is not specific to when the 20% equity objective is to be achieved. I, however, find based on the evidence provided in both the Elenchus and the Knecht reports that rates should continue to be sufficient to achieve progress toward attaining an equity target beyond the 20% equity objective in advance of the proposed Mactaquac refurbishment.

[13] This concludes my concurring reasons to this decision of the Board.

John Patrick Herron
Member