FAIR RETURN FOR NEWFOUNDLAND POWER (NP)

EVIDENCE OF

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BEFORE THE

Board of Commissioners of Newfoundland and Labrador.

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TABLE OF CONTENTS

EXECUTIVE SUMMARY

1) This report comes 2 ½ years after my last report and events have progressed largely as I anticipated at that time in that Canada has used up its remaining spare capacity. On most objective criteria Canada is reaching the peak of the business cycle. This is largely the result of a booming US economy with an unemployment rate 0.7% below the natural or normal rate and an economic growth rate significantly exceeding its trend line.

2) The problems that were evident in 2016, a technical recession, weak commodity prices, widening credit spreads, tightening loan standards and a stock market 14% off its highs, have all dissipated. Instead, credit spreads have tightened from 1.90% down to 1.35%, the stock market has boomed, the KCFSI and the Bank of Canada's loan survey both indicate easier credit, and commodity prices have strengthened.

3) By all objective criteria the financial system has returned to health in the US and now both the US and Canada have fully recovered from the financial crisis. The most obvious indicator is the persistent increases in the policy rates targeted by both the US Federal Reserve and the Bank of Canada. In fact, the US Fed anticipates increasing the Federal Funds rate to slow down the US economy in 2020.

4) The conundrum is that although the headline CPI inflation rate is above 2.0% in both the US and Canada, the core rates are not, while wage growth is anaemic. This seems to be leading President Trump to push the envelope with both trade and tax policy designed to increase demand and boost production in the US and not China. Canada again seems to be suffering potential collateral damage in terms of the renegotiation of NAFTA.

5) The absence of the expected inflation for this stage in the business cycle coupled with the huge amount of bonds taken off the market through quantitative easing in the US, Europe, the UK and Japan means that long term bond yields are yet to be determined by private purchasers and are instead still largely determined by central banks. Paradoxically, the expected long Canada bond yield is lower today at 3.0% than it was in 2016 at 3.65% which in turn is lower than it was in my 2012 report at 4.55%.

6) If NP were still on a formula ROE the decline in A credit spreads of 0.45% since 2016 coupled with the drop in forecast long Canada bond yields of 0.65% would together indicate a significant drop in the allowed ROE. However, I do not judge the resulting ROE to be fair since I do not believe that equity markets are keying off these very low government bond yields. In particular, I continue to believe, though with some misgivings, that the allowed ROE should not be changed from 7.5% until the forecast long Canada bond yield exceeds 3.8%. Consequently, I continue to recommend a 7.5% allowed ROE, but would point out that there is increasing evidence that the current 8.50% allowed ROE is generous.

7) In terms of business risk I judge NP to be a typical Canadian utility. The addition of three more years of data has not changed that assessment, since NP over-earned in each of those years. Risk is the probability of incurring a loss and in the last 25 years it is difficult to see any material losses. Consequently, I tend to believe that NP is being allowed a risk premium for risks that it is not bearing

8) In 2016 I entered extensive business risk and capital structure evidence recommending a gradual reduction in NP's common equity ratio. The Board rejected that recommendation and awarded NP a 45% common equity ratio, which exceeds that of its Canadian peers. The main justification seemed to be the possibility of increasing electricity prices from the pass through of Muskrat Falls costs. NP is now justifying its increased revenue requirement on an increased ROE and higher risk due to those *same* increased costs.

9) The only way that higher electricity prices can increase NP's risk is if they increase the likelihood of NP failing to earn its allowed ROE as customers shift to alternative fuels. I do not think this risk is significant for two reasons. First, the province will in all likelihood reallocate some of those costs to other entities to reduce rate shock as I am sure it knows of the experience of the Liberal government in Ontario. Second, electricity costs in the province can absorb higher costs without becoming so large as to encourage people to drop off the system. So in my judgement the death spiral risk is non-existent.

10) I regard a 7.5% ROE for NP on 40% common equity as satisfying the fair return standard. However, since the Board heard full business risk and capital structure evidence in 2016 and fixed NP's common equity ratio at 45% I have not entered full evidence on the common equity ratio again. For this reason, I strongly recommend that the Board reduce the allowed ROE, since all the normal indicators point to a lower ROE than the 8.50% set by the Board in 2016.[1]

[1] My understanding is that if the ROE is maintained at 8.50% there is no material increase in NP's revenue requirement. A reduction to a fair rate of return will then decrease rates and somewhat cushion rates from potential increases in electricity costs.