- Q. (Re: p.15 Off Peak Power)
  - (a) Has ACI-Grand Falls ever used the article with respect to off peak power?

Can industrial customers currently shift their load from Hydro and to what extent? Would this be through generation or through load?

- A. (a) An off peak power rate and details have never been finalized in regard to the article in the ACI-Grand Falls contract regarding off peak power. Any time it was discussed with Newfoundland Hydro, there was no interest on their part to supply it since it had no advantage to them. Thus ACI-Grand Falls has never used this article.
  - (b) Industrial Customers cannot currently shift their loads from Hydro since, as referenced in the Reply to CA 162, it has no price structure in respect of time of day rates by which to judge whether the price incentives would be sufficient to justify a necessary investment in pulp storage facilities and justify changes in production practices. Without a rate structure from which to work, it is not possible to determine whether a customer would shift its load or to what extent such shifting would occur. ACI-Stephenville estimates that it could potentially shift 15 MW of load from day to night provided the economics justify the shift. No estimates are available for any other customers.