Compare in detail the COSS firm energy cost and the non-firm energy charge rate as proposed in Schedule A of the Application, assuming the average cost of fuel assumed for the COSS; indicate how this charge could likely vary by month and time of day, based on the assumptions adopted for COSS as to expected fuel use. Explain how in practice it will be determined what fuel source is used to supply non-firm energy. What will happen if this energy is supplied in whole or in part from non-thermal sources?

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A. The following table compares the industrial firm energy charge with the industrial non-firm energy charge by month for 2004. It uses the average cost of fuel used in the cost of service for each source.

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Comparison of Industrial Firm Rates and Non-Firm Energy Rates Original Filing

		Holyrood		Gas Turbine		Diesel	
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Month	Firm	Non-Firm	Variance	Non-Firm	Variance	Non-Firm	Variance
	Energy	Energy Rate	from Firm	Energy Rate	from Firm	Energy Rate	from Firm
	Rate						
January	\$0.02765	\$0.05267	\$0.02502	\$0.10684	\$0.07919	\$0.11982	\$0.09217
February	\$0.02765	\$0.05205	\$0.02440	\$0.10793	\$0.08028	\$0.11982	\$0.09217
March	\$0.02765	\$0.05189	\$0.02424	\$0.10934	\$0.08169	\$0.11982	\$0.09217
April	\$0.02765	\$0.05189	\$0.02424	\$0.10923	\$0.08158	\$0.11982	\$0.09217
May	\$0.02765	\$0.05169	\$0.02404	\$0.10923	\$0.08158	\$0.11982	\$0.09217
June	\$0.02765	\$0.05169	\$0.02404	\$0.10913	\$0.08148	\$0.11982	\$0.09217
July	\$0.02765	\$0.05169	\$0.02404	\$0.11021	\$0.08256	\$0.11982	\$0.09217
August	\$0.02765	\$0.05169	\$0.02404	\$0.11015	\$0.08250	\$0.11982	\$0.09217
September	\$0.02765	\$0.05158	\$0.02393	\$0.11015	\$0.08250	\$0.11982	\$0.09217
October	\$0.02765	\$0.05154	\$0.02389	\$0.11147	\$0.08382	\$0.11982	\$0.09217
November	\$0.02765	\$0.05151	\$0.02386	\$0.11143	\$0.08378	\$0.11982	\$0.09217
December	\$0.02765	\$0.05150	\$0.02385	\$0.11143	\$0.08378	\$0.11982	\$0.09217

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The non-firm energy charge will be at the Holyrood non-firm rate for all periods including the periods when no thermal source is operating, except when either or both of the diesel plants and the gas turbine plants are operated or their output must be increased to meet the non-firm load.

Typically the diesel plants or gas turbine plants would be required to meet non-firm energy requirements during peak load periods or when there are transmission restrictions to the area of the grid where the customer is located. Although the higher non-firm rates could apply during any hour of the year due to transmission or generation problems, the probability is higher in the winter period (December to March) and during the peak hours of 0800 to 2000 hours each day.

The decision to use a higher cost source is made by the power system operator when he determines there is insufficient power or energy available from other sources, either hydroelectric or Holyrood to meet the load demanded on the system, or there is insufficient transmission capacity to an

area where the non-firm load is being demanded.