

1 **Q. Further to the response to IC-421 NP, does Newfoundland Power consider the**
2 **requirement to manage and operate its facilities in a manner that is least cost to the**
3 **customer a legislative requirement?**
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5 A. Yes, Newfoundland Power does consider the requirement to manage and operate its
6 generating facilities in a manner that is least cost to the customer a legislative
7 requirement.
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9 It is Newfoundland Power's position that the Sample Rate proposed by Hydro should not
10 be implemented for the reasons outlined in Newfoundland Power's Prefiled Evidence,
11 including that it provides an incentive for the management of generation facilities that is
12 contrary to Section 3(b)(i) of the *Electrical Power Control Act* and is therefore
13 inappropriate.