

Re: Page 35, lines 23-24

Q. Please provide evidence relied on to state that "NP's thermal generation plays no role in meeting the system energy requirements" and reconcile with the response to IC-188 NLH.

A. The statement refers to the fact that NP's thermal generation is not considered whatsoever by Hydro in assessing the system firm energy requirements (as noted in Haynes, Schedule II where all thermal generation other than Holyrood is given no consideration in meeting Island firm energy requirements).

The response to IC-188 NLH indicates that the NP thermal generation has on occasion been operated to meet Island Interconnected peak prior to the addition of Granite Canal and the two new PPAs (primarily in the 1996-1998 period). However, it does not appear that these units were operated for sufficient time, given their small size, to result in any material energy output.