| 1 | Q. | Confirm that Hydro does not use the average annual energy in evaluating its |
|----|----|--|
| 2 | | firm energy criterion for generation planning purposes (Production evidence, |
| 3 | | page 29, lines 1 to 2). |
| 4 | | |
| 5 | | |
| 6 | A. | In carrying out the long term planning function Hydro uses both firm and |
| 7 | | average annual energy capability estimates. In assessing the capability of |
| 8 | | the Island Interconnected System to meet future load requirements, Hydro |
| 9 | | uses firm annual energy estimates as stated in its Energy criteria (Production |
| 10 | | evidence, page 36, lines 11 through 14). The planning criteria essentially set |
| 11 | | the timing of resource additions. |
| 12 | | |
| 13 | | When estimating future costs of production, Hydro uses estimates of average |
| 14 | | annual energy. |