

1 Q. Under what operating conditions would the non-firm industrial rate be
2 withdrawn or curtailed by NLH? Over the past ten years, how often do these
3 conditions arise? When such circumstances do arise, how often are non-
4 firm customers partially curtailed? How often are non-firm customers fully
5 curtailed? If data is not unavailable, please provide an order of magnitude
6 estimate in terms that are relative to equivalent firm service.

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9 A. Hydro would curtail or withdraw the non-firm industrial rate to maintain
10 reliable supply of electricity to its customers when there exists a shortage of
11 generation on the power system. Prior to curtailing the industrial non-firm
12 power, Hydro will:

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14 1. Ensure all its available hydraulic and steam generators are loaded to near
15 full capacity;
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17 2. Request Newfoundland Power maximize its hydraulic generation;
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19 3. Request Deer Lake Power and Non-Utility Generators maximize their
20 generation; and
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22 4. Start and load both Hydro and Newfoundland Power standby gas turbine
23 and diesel generation.

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25 Over the past ten years, this operating condition occurred once. During that
26 instance the Industrial Customers were not taking any non-firm power and as
27 a result, Hydro requested two Industrial Customers to reduce their firm load
28 by 15 megawatts each.