1	Q.	With respect to CA 75 NLH (Parts e, f, and g), Hydro's answer was non-		
2		responsive. Reference to the Fuel Oil Practices Review and Policy does not		
3		constitute an answer to the RFI. To restate CA 75 NLH:		
4				
5		For fuel purchases made for Holyrood covering the period of fiscal year 2000		
6		to 30 June 2006, please provide the following information:		
7				
8		(a)	Type of fuel purchased;	
9		(b)	Volume purchased;	
10		(C)	Price paid;	
11		(d)	Spot price on the date of purchase;	
12		(e)	6-month future price on the date of the purchase (i.e., that is the price	
13			quoted 6 months earlier for delivery on the date of the purchase);	
14		(f)	12-month future price on the date of the purchase (i.e., that is the	
15			price quoted 12 months earlier for delivery on the date of the	
16			purchase);	
17		(g)	For parts e and f, please identify the source of the future pricing data.	
18			(Emphasis added)	
19				
20		Provide the information in Parts e, f, and g.		
21				
22				
23	Α.	(e) – (g)		
24		Subsequent to the previous response to CA 75 NLH, Hydro has consulted		
25		with the PIRA Energy Group, Hydro's oil market advisors, to seek their		
26		opinion on the practicality of providing the requested data. PIRA advised that		
27		a me	aningful conclusion cannot be drawn from the requested data set for the	
28		following reasons:		

1 1. There is no historical database for fuel oil futures. Fuel oil hedges are 2 over-the-counter financial instruments between particular buyers, 3 sellers, and intermediaries. It is not a formal futures exchange with 4 formal records as with the New York Mercantile Exchange (NYMEX) 5 for West Texas Intermediate (WTI) crude oil. 6 2. 7 While a reliable historical crude oil futures database can be built using 8 historical NYMEX data, the basis risk between WTI crude oil futures 9 and fuel oil is high and therefore WTI would not be recommended as 10 an analytical vehicle for evaluating the past performance of fuel oil 11 hedges. (Basis risk means that the relationship between fuel oil and 12 crude oil is guite variable, reflecting either the changing supply/ 13 demand circumstances of fuel oil markets or circumstances pertaining 14 to world crude oil supply/demand, as well as U.S. Midwest crude 15 supply/demand since WTI is an inland domestic U.S. crude oil.) 16 17 3. PIRA cautions that the selection of a 6-month and 12-month prior 18 future price to a given actual purchase date is arbitrary and the 19 analytical results inferred from this data on hedging performance could 20 well be spurious. CA 217 NLH is asking for just two prior futures 21 quotes from the previous year when in fact there are hundreds of 22 futures that could have been applicable for the actual purchase date (i.e. maybe the 62nd and 300th day earlier than the purchase date 23 could have provided opposite results to the 6-month and 12-month 24 25 dates).