

1 Q. Does Mr. Greneman agree that the firm energy element of Hydro's
2 generation planning criteria (explained on p. 28 of Regulated Activities
3 evidence) can result in Hydro requiring plant additions solely as a result of
4 forecast growth in customer firm energy requirements? If not, why not? (NP-
5 79 NLH)

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8 A. Mr. Greneman does not agree. Firm available capacity is a prerequisite for
9 firm energy production. NP's load factor has remained relatively stable and
10 predictable over the years and Hydro has planned its capacity additions to
11 serve NP's forecast peak demand in the most economical fashion with
12 recognition of its attendant firm energy requirements.