1 Q. Re: Pre-filed Testimony of Mr. P. Bowman, page 37, lines 5-13:

"The gross asset value of the frequency converter is quoted at \$10.763 million 2 at IC-NLH-103 Attachment 1, which is approximately equal to the amount 3 spent to date on residential CDM, which is funded by the entire grid (\$10.589) 4 5 million by 2019). The difference is that residential CDM benefits provincial power supply by only 11,366 MWh, while the frequency converter enables 14 6 times this much power (158 GW.h) to avoid being bottled up to low value uses 7 (heat). While this comparison is not entirely apples-to-apples, it underlines that 8 9 the function of the frequency converter (Increased net availability of 60 Hz power to serve customers) is not different than the CDM programming, but at 10 a far more effective investment profile for grid customers." 11

- Please explain why the value of power that flows through the frequency converter and is used for on-site bill reduction is a valid comparison with CDM expenses which reduce costs for all customers.
- A. CDM is an "on-site bill reduction program" for the participating customer, which simultaneously means that less Holyrood generation is required on the system (which reduces costs for all customers as long as the investment in CDM does not exceed the Holyrood savings). In this manner the issues of the frequency converter are identical.