

1 Q. **Reference: 2018 Cost of Service Methodology Review Report dated November 15, 2018**

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3 On page 73, lines 28 – 29 and page 74, line 1 of the CA Energy Consulting Report, it is stated
4 with respect to NP generation “*Second, consider a situation in which the Hydro demand*
5 *discount is terminated and Hydro and NP enter into a power purchase agreement in which*
6 *Hydro purchases all the usage of the plants.*” Did Hydro consider such an arrangement with
7 NP? If not, why not? Is Hydro considering such an arrangement with CBPP? If not, why not?

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10 A. As described in Newfoundland and Labrador Hydro’s (“Hydro”) Summary Report to the
11 Application,¹ the generation credit approach for providing system capacity in both the Cost
12 of Service study and the wholesale rate design is structured to be consistent with the least
13 cost operation of generation resources for both Hydro and Newfoundland Power. Entering
14 into a purchase power arrangement as described in the question above would be complex
15 and may not achieve the least-cost objective that is currently being achieved under the
16 generation credit approach.

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18 The benefits to all customers arising from the fuel cost savings that supported the Corner
19 Brook Pulp Paper Ltd. (“CBPP”) pilot project implementation are not expected to continue
20 upon commissioning of the Muskrat Falls Project. Therefore, Hydro proposes to discontinue
21 the generation credit agreement between Hydro and CBPP upon full commissioning of the
22 Muskrat Falls Project. However, Hydro believes CBPP should have the opportunity to
23 manage its generation as efficiently as possible and, to that end, proposes to work with
24 CBPP in the rate design review planned for 2019 to develop a proposal to achieve this
25 objective.

¹ "2018 Cost of Service Methodology Review Report," submitted to the Board of Commissioners of Public Utilities on November 15, 2018.