

- 1 **Q. (Reference Pre-filed Evidence of Larry Brockman) It is stated (page 12, lines 11 to**  
2 **12) "While the system load factor method does include an energy weighting, it is not**  
3 **rooted in cost causality." Would classifying all hydro generation on the system**  
4 **regardless of vintage on the same basis as Muskrat Falls with a 20%/80%**  
5 **demand/energy split be more reflective of cost causality than use of the system load**  
6 **factor method? Please explain.**  
7
- 8 A. Without performing actual calculations of the demand/energy split for all the vintage  
9 units on the system, Mr. Brockman is unable to say how reflective of their cost causality  
10 a 20%/80% split between demand and energy (based on Muskrat Falls numbers) would  
11 be. For that reason, it is not possible for Mr. Brockman to make definitive comparisons  
12 of the results of such an approach and the results of the system load factor method from a  
13 cost causality perspective.