

- 1   **Q:**    **With reference to page 38 of the Brattle Group report, if it was determined**  
2           **that the O&M costs of Holyrood Unit 3 were driven primarily by maintaining**  
3           **the condition and readiness of the Unit, and not by the incremental kWh that**  
4           **the Unit enabled, would this change the Brattle Group's recommendation that**  
5           **new costs including O&M should be classified as energy?**  
6
- 7    **A.**    No, the fact stated in the question would not change our recommendation that new  
8           costs including O&M should be classified as energy.