

1   **Q:**   **Reference: “Embedded and Marginal Cost of Service Review,” The Brattle**  
2           **Group, May 3, 2019, Exhibit II at p. 32 ff.**

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4           **Newfoundland and Labrador Hydro has submitted that the equivalent peaker**  
5           **method has a theoretical advantage over other methods, including other**  
6           **energy-weighting methods of classification, due to its grounding in estimating**  
7           **shares based on system planning principles. Does The Brattle Group disagree**  
8           **with this position?**

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10   **A.**    We disagree that there is a theoretical advantage of the equivalent peaker method  
11           over other energy-weighting methods, *per se*, as the literature does not support that  
12           position. The choice of an energy-weighting method is generally specific to  
13           company system characteristics as well as regulatory and policy precedence.