

1 Q. **Reference: Hydro’s 2018 Cost of Service Methodology Review Report, Appendix A – Cost**  
2 **of Service Methodology Review prepared by Christensen Associates Energy Consulting,**  
3 **November 15, 2018, Page 22, Lines Table 2.**

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5 To Christensen’s knowledge, what other jurisdictions in North America, besides SaskPower,  
6 utilize an equivalent peaker methodology to classify generation?

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9 A. This response has been provided by Christensen Associates Energy Consulting.

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11 Christensen Associates Energy Consulting has not conducted a survey of U.S. jurisdictions.

12 Our basis in terms of precedent for proposing this approach relies in its recognition in the

13 NARUC Electric Utility Cost Allocation Manual, which describes generation cost

14 classification methods in use in the U.S.<sup>1</sup> More generally, our basis for this approach is its

15 representation of least cost resource criteria, and resulting generation investment decisions

16 of system planners.

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<sup>1</sup> National Association of Regulatory Utility Commissioners, *Electric Utility Cost Allocation Manual*, January 1992. See the discussion beginning on page 52. A searchable electronic version of this document is here: [http://www.pubmanitoba.ca/v1/pdf/cos\\_review/exhibits/mipug-28.pdf](http://www.pubmanitoba.ca/v1/pdf/cos_review/exhibits/mipug-28.pdf)