

- 1 **Q. Reference Prefiled Evidence of Larry Brockman: Is it Mr. Brockman's position that**
2 **Hydro's current use of the system load factor classification methodology for its**
3 **existing hydraulic assets does not reflect the cost causality of those investment**
4 **decisions? If the answer is no, please fully explain why.**
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- 6 A. In 1992, Mr. Brockman recommended the use of the equivalent peaker method to
7 classify Hydro's existing hydraulic assets. His agreement with the continued use of the
8 system load factor method for Hydro's existing hydraulic assets at this time is based on
9 practical, not theoretical, considerations.¹
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- 11 For Mr. Brockman's opinion regarding the relative merits of the equivalent peaker
12 method and the system load factor method, please see the response to Request for
13 Information PUB-NP-005.

¹ For additional information, see *Prefiled Evidence of Larry Brockman*, page 14, line 9 to page 15, line 3; and response to Request for Information CA-NP-002.