

IN THE MATTER OF the *Electrical Power Control Act, 1994*, SNL 1994, Chapter E-5.1 (“EPCA”) and the *Public Utilities Act*, RSN 1990, Chapter P-47 (“Act”);

AND IN THE MATTER OF the Application by Newfoundland and Labrador Hydro for the approval of deferral accounts to address material changes in system costs as a result of the Muskrat Falls Project and phasing out of the Holyrood Thermal Generating Station as a generating facility, pursuant to section 58, 71, and 80 of the Act.

**Requests for Information
by the Labrador Interconnected Group**

Supply Cost Accounting Application

LAB-NLH-010

September 21, 2021

Supplemental Request for Information Regarding the Supply Cost Accounting Application

LAB-NLH-10. **Re: LAB-NLH-006, p. 1**

Citation:

824 MW is the design capacity of the Muskrat Falls Generating Station but, as is the case with any generating station, this capacity is not expected to be available at all times. However, the plant will be operated in coordination with the Churchill Falls plant to ensure full capacity is available when required to serve the customers of Muskrat Falls. Operating these two plants in a coordinated manner results in more efficient operations and more energy being available at both plants, thereby benefitting their respective customers and shareholders, including Hydro-Quebec. This coordinated operation has no impact on the ability of Hydro-Quebec to access capacity from Churchill Falls; therefore, the Supreme Court ruling referenced is irrelevant. Given these factors, Newfoundland and Labrador Hydro (“Hydro”) is confident that coordinated operation between the plants will continue and that the full capacity of Muskrat Falls will be available if and when required. (underlining added)

- a. Please provide support for the statement that “the plant will be operated in coordination with the Churchill Falls plant to ensure full capacity is available when required to serve the customers of Muskrat Falls”. Is this statement based on a formal agreement with CF(L)Co? If so, please provide a copy. If not, please explain in detail the justification for the statement.**
- b. Please explain how, during a peak period when the full output of the Muskrat Falls Generating Station is required to serve NLH and its other customers, Hydro can be sure that supplemental power will be available from Churchill Falls, without infringing on Hydro-Québec’s access to its full capacity?**