

1 **Q. [InterGroup Consultants Evidence, page 36, footnote 76]**

2 **Please explain in detail how Hydro's use of Newfoundland Power's native load net**
3 **of the curtailable credit in the 2015 Cost of Service Study is different from Hydro's**
4 **past Cost of Service Study practice of using Newfoundland Power's forecast**
5 **native peak which explicitly deducted Newfoundland Power's curtailable load.**

6 **A. Messrs Bowman and Najmidinov cannot comment how the 2015 Cost of Service study is**
7 **"different" as they have not previously (prior to 2014) reviewed the issue of how NP's**
8 **Curtailable Load was considered as part of the Cost of Service Study mathematics.**

9 Messrs Bowman and Najmidinov cannot recall previously supporting the
10 appropriateness of any previous Hydro Cost of Service study that explicitly deducted off
11 any Newfoundland Power Curtailable Load from NP's peak demand. In contrast,
12 InterGroup's Pre-filed Testimony from April 28, 2014 on page 33 concluded that "NP's
13 use of curtailable load should not be permitted to reduce their peak cost allocation from
14 Hydro's system for COS purposes." Such treatment is inconsistent with allocating
15 appropriate cost responsibility for system components that are classified to demand,
16 such as the transmission system or generation peaking resources, and is inconsistent
17 with the treatment of industrial customer demand.