

1 Q. **Reference: Schedule 3**

2 In retrospect:

3 a) If the Holyrood TGS had not been in generation mode during winter 2024/25 and winter
4 2025/26, would Hydro have been able to provide sufficient energy and capacity for the
5 IIS? If not, please identify the frequency and magnitude of any shortfalls.

6 b) If only Unit 3 had been available for generation during winter 2024/25 and winter
7 2025/26, would Hydro have been able to provide sufficient energy and capacity for the
8 IIS? If not, please identify the frequency and magnitude of any shortfalls.

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11 A. Newfoundland and Labrador Hydro (“Hydro”) submits that the requested information is not
12 relevant to the determination of the proposed 2027 capital expenditures in the 2027 Capital
13 Budget Application. The Request for Information seeks hypothetical retrospective analyses of
14 system operations during the winters of 2024–2025 and 2025–2026 under generation scenarios
15 that did not occur and that are not necessary to assess the need for, or prudence of, the capital
16 investments proposed in the Application. Hydro notes that the role of the Holyrood Thermal
17 Generating Station within the Island Interconnected System, including reliability and resource
18 adequacy considerations, has been addressed in other proceedings and planning processes.