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1 Q. (Reference CA-NP-120) It is stated (part d) "These limitations provide Newfoundland 2 Power with the ability to curtail for the duration of a morning and evening peak." 3 a) Please define the morning and evening peak. Does this relate to the NL system as 4 a whole, or only Newfoundland Power's system? 5 b) Does the NL System Operator instruct Newfoundland Power when to interrupt 6 **Curtailable Service customers?** 7 c) Under what circumstances does Newfoundland Power interrupt Curtailable 8 Service customers when not directed to do so by Hydro? 9 d) Does Newfoundland Power believe that a credit of \$29/kVA adequately 10 compensates Curtailable Service customers when the marginal cost of capacity is 11 \$309.94/kW (Attachment A), and when Hydro is considering bringing on 12 additional generating capacity owing to an expected capacity shortfall on the 13 system? 14 15 a) On-peak winter hours, as outlined in Hydro's 2023 marginal cost update, are A. 16 7:00 a.m. to 10:00 p.m., Monday through Friday in the months of December to March.¹ 17 18 19 b) Order No. P.U. 47 (2014) effectively restricts the Company's requests to curtail to 20 circumstances where there is a capacity constraint on the Island Interconnected 21 system. 22 23 In Order No. P.U. 47 (2014), the Board approved a revision to Hydro's wholesale rate to reflect a curtailable load credit (the "Curtailable Credit") in the computation of 24 billing demand for Newfoundland Power.² The Curtailable Credit ensures that 25 26 curtailments are requested from Newfoundland Power customers only to meet system load requirements, which would be at the request of Hydro. 27 28 29 Accordingly, Newfoundland Power does not initiate customer curtailment without a 30 request from Hydro. 31 32 c) See the Response to part b). 33 34 d) The Curtailable Service Option Review report filed as part of the Company's 35 2016/2017 General Rate Application found that the \$29 kVA curtailment credit was reasonably consistent with other jurisdictions and comparable to the interruptible

See Attachment B to the response to Request for Information CA-NP-096.

relation to the 2016/2017 General Rate Application.⁴

agreements between Hydro and two of its industrial customers at that time.³ Changes

to the Curtailable Service Option formed part of the Settlement Agreement filed in

On an interim basis. In Order No. P.U. 49 (2016), the Board approved use of the Curtailable Credit on a final

See Newfoundland Power's 2016/2017 General Rate Application, Volume 2, Exhibits and Supporting Materials, 8 Curtailable Service Option Review, page 6.

See Order No. P.U. 18 (2016), page 9, line 41 to page 10, line 13.

The Curtailable Service Option is currently being reviewed as part of the ongoing rate design review, which will consider the amount of the curtailment credit.