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NEWFOUNDLAND POWER
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May 4, 2018

Board of Commissioners
of Public Utilities
P.O. Box 21040
120 Torbay Road
St. John's, NL A1A 5B2

Attention: G. Cheryl Blundon
Director of Corporate Services
and Board Secretary

Ladies and Gentlemen:

Re: Newfoundland and Labrador Hydro - Approval to Defer the 2015, 2016 and 2017 Balances in the Isolated Systems Supply Cost Variance Deferral Account, the Energy Supply Cost Variance Deferral Account and the Holyrood Conversion Rate Deferral Account – Requests for Information

Please find enclosed the original and 13 copies of Newfoundland Power's Requests for Information NP-NLH-298 to NP-NLH-337 in relation to the above noted Application. Please note that these RFIs are filed as part of Hydro's 2017 General Rate Application and have been numbered in sequence.

For convenience, the Requests for Information are provided on three-hole punched paper.

A copy of this letter, together with enclosures, has been forwarded directly to the parties listed below.

If you have any questions regarding the enclosed, please contact the undersigned at your convenience.

Yours very truly,

Gerard Hayes
Senior Counsel

Enclosures

c. Geoffrey Young
Newfoundland and Labrador Hydro

Paul Coxworthy
Stewart McKelvey

Senwung Luk
Olthuis, Kleer, Townshend LLP

Dennis Browne, QC
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Newfoundland Power Inc.
55 Kenmount Road • P.O. Box 8910 • St. John's, NL A1B 3P6
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IN THE MATTER OF the Electrical Power Control Act 1994, RSNL 1994, Chapter E-5.1 (the EPCA) and the Public Utilities Act, RSNL 1990, Chapter P-47 (the Act), and regulations thereunder;

IN THE MATTER OF an Application by Newfoundland and Labrador Hydro for the approval to defer the balances in: i) the Isolated Systems Supply Cost Variance Deferral Account; ii) the Energy Supply Cost Variance Deferral Account; and iii) the Holyrood Conversion Rate Deferral Account, pursuant to Sections 70(1) and 80 of the Act.

Requests for Information by
Newfoundland Power Inc.

NP-NLH-298 to NP-NLH-337

May 4, 2018

Requests for Information

NP-NLH-298 Provide a copy of the PowerPoint presentation titled *Realtime Indication of Island Generating Capacity and Reserves, Presentation to Newfoundland Power February 2015*.

NP-NLH-299 **Reference: Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, Page 4, lines 20-23.**

Through its investigation and summary report following the March 4, 2015 Avalon Voltage Collapse events, Liberty commented on Hydro's then lack of reliability culture and failure to plan for contingency events. Furthermore, Liberty indicated that Hydro has a "non-standard industry thinking associated with reliability.

Please confirm that in its October 22, 2015 *Review of the Newfoundland and Labrador Hydro, March 4, 2015 Voltage Collapse* Liberty Consulting did not specifically recommend the use of standby and emergency generation in the manner ultimately implemented by Hydro.

NP-NLH-300 **Reference: Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, Page 7, lines 13-21.**

Finally, Hydro has discussed or provided information regarding its philosophy and practices to the Board in its reply to the Liberty March 4, 2015 Voltage Collapse report, throughout the testimony provided as part of Hydro's 2013 Amended GRA and Hearing, in the 2015 Cost Deferral Application, the 2016 Application for Standby Fuel Deferral Costs, the 2016 Supplementary Application for Overhaul of the Holyrood CT, in the 2017 Establishing a Robust Operational Philosophy and Enhancing Skills and Capabilities Relating to Systems Reliability and Analysis, the Monthly Energy Supply Reports, through various letters in response to Board requests, and through other capital and supplementary capital budget applications related to standby units.

Provide a list specifying all relevant excerpts from each of the references cited.

NP-NLH-301 **Reference: Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, Page 2, Footnote 3.**

Aligned with best practice reliability standards, Hydro operates its generation fleet (including thermal generation, emergency and standby generation) to position the power system to withstand the single worst contingency event.

Please provide copies of all reliability standards to which this passage refers, and explain in detail how Hydro's operation of its generation fleet is aligned with such standards, with specific reference to the use of gas turbines and other forms of emergency and standby generation in providing online and synchronized spinning reserve.

NP-NLH-302 **Reference: Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, Page 2, lines 16-18.**

"*…Hydro took a number of steps, one of which was that the Company adjusted its operation of generating units to ensure that reliability was a key element of its operational decision making.*"

Please list the other steps taken by Hydro, as referred to in the cited passage, to ensure reliability was a key element of Hydro's operational decision making.

NP-NLH-303 **Reference: Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, Page 2, lines 18-22.**

"*This adjustment in operations ensures that generation is already online and synchronized to the grid in the event of a system contingency, thereby mitigating the impact on customers. While this approach minimizes both the magnitude of the disruption as well as the number of customers impacted, this greater customer reliability focus carries with it greater costs associated with the increased use of gas turbines.*"

For each of 2015, 2016 and 2017, please list all specific instances of contingencies that were either mitigated or avoided by having the Avalon Peninsula gas turbines already online and synchronized to the grid.

NP-NLH-304 Were there any occasions when failure of a gas turbine or thermal unit that had been placed online and synchronized to the grid solely to meet spinning reserve requirements caused a customer outage? If so, please provide details.

NP-NLH-305 **Reference: Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, Pages 11-13, Table 2: Selected Underfrequency Load Shed Events.**

Please calculate the average time to commence restoration and the average time to complete restoration for all underfrequency load shed events for each year from 2008 through 2017.

NP-NLH-306 **Reference: Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, Page 14, lines 1–3 and lines 6-8.**

"*The data shows that for UFLS events prior to 2014, when Hydro had been operating with online reserves lower than the largest online unit, customer restoration times of eleven to sixteen minutes for UFLS events were not uncommon."*

and

"*Since implementing a spinning reserve target to cover the loss of Hydro's largest generating unit, customer restoration typically begins within 1-2 minutes and is typically complete within 6 minutes."*

Is the 5-10 minute reduction in the duration of UFLS events implied in the two cited passages the only benefit to customers of Hydro's dispatch of standby units in advance of contingencies? If not, please describe the other benefits with reference to specific events.

NP-NLH-307 **Reference: Realtime Indication of Island Generating Capacity and Reserves presentation.**

"*For NLH units and Star Lake, the calculation uses the gross continuous unit ratings which may be adjusted on an operational basis from time to time, to reflect low water levels or inflows, unit availability and temporary unit de-ratings*."

Please confirm that, in the calculation of available capacity, on days when both Holyrood Units 1 and 2 are de-rated, Hydro uses the de-rated value(s) in the calculation of available capacity. If not, why not?

NP-NLH-308 **Reference: 2017 General Rate Application, response to Request for Information PUB-NLH-046.**

"*Currently, Hydro dispatches its resources and agreements to achieve a spinning reserve equal to the capacity of the largest generating unit. As noted in Footnote 52 on page 3.23, for the current system this is equal to 170 MW when Unit 1 or Unit 2 at Holyrood is on line and 154 MW when Holyrood is not on-line (the latter is the capacity of Bay d'Espoir Unit 7). This enables Hydro to position the system to be able to restore customers quickly in the event of the loss of the largest generating unit. Hydro also maintains an additional reserve of at least 70 MW for a total available reserve equal to or greater than the largest generating unit plus 70 MW."*

Please confirm that, for the current system, spinning reserve would only be equal to 170 MW when either Unit 1 or Unit 2 at Holyrood is on line and operating without any deratings. If not confirmed, why not?

NP-NLH-309 **Reference: 2017 General Rate Application, response to Request for Information NP-NLH-038, Attachment 1, Establishing a Robust Operational Philosophy and Enhancing Skills and Capabilities Relating to Systems Reliability and Analysis, Page 13, lines 19–20.**

"*T-096 provides clear instruction to operators that reserves equal to the single largest contingency, plus an additional reserve of 35 MW must be maintained for the Avalon Peninsula.*"

Please describe, and if possible provide, the analysis undertaken by Hydro to determine that reserves equal to the single largest contingency, plus an additional reserve of 35 MW, are necessary for the Avalon Peninsula.

NP-NLH-310 **Reference: Hydro's Recovery of the 2015 and 2016 Balances Application, response to Request for Information NP-NLH-022, page 2 of 4, lines 21–25.**

"*The Island Interconnected reserve criterion was also reviewed and spinning reserve targets were established to cover* ***the loss of the single largest operating unit****. This is typically in the range of 150-170 MW, depending on the largest unit in operation. Maintaining this level of spinning reserve positions the system for an expedient restoration of customers in the event of the loss of a major generating unit.*" [emphasis added]

Footnote 52 on page 3.23 of Hydro's 2017 General Rate Application states that Hydro attempts to achieve spinning reserve equal to ***the capacity of the largest generating unit***. In the Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, page 2, footnote 3, it is indicated that Hydro operates its generation fleet to position the power system to withstand ***the single worst contingency event***. Please compare and contrast these two criteria with ***the loss of the single largest operating unit*** as referred to in the response to Request for Information NP-NLH-022, and specify the circumstances in which each criterion is applicable.

NP-NLH-311 Please explain why spinning reserve targets were established based on the ***capacity*** of a generating unit rather than the ***actual production level*** of the generating unit at the time of the contingency.

NP-NLH-312 **Reference: Hydro's Recovery of the 2015 and 2016 Balances Application, response to Request for Information NP-NLH-030, Table 1, March 9, 2015.**

The Holyrood GT was operated from 4:00 AM through 8:00 AM on this date. Prior to starting the Holyrood GT, the Island Spinning Reserve was approximately 375 MW, or 205 MW above the target of 170 MW. In the comments for Table 1 Hydro states "Due to uncertainties in the load forecast the request was made to operate the HRD GT instead." Who made the request, at what time was the request made, and why was it necessary to start the Holyrood GT with such healthy reserve levels?

NP-NLH-313 **Reference: Hydro's Recovery of the 2015 and 2016 Balances Application, response to Request for Information NP-NLH-030, Table 5, October 15, 2016.**

The Holyrood GT was operated from 8:00 AM through 4:00 PM on this date. Prior to starting the Holyrood GT the Island Spinning Reserve was approximately 310 MW, or 140 MW above the target of 170 MW. On-Line Avalon reserves were also in excess of 300 MW for much of the day. In the comments for Table 5, Hydro states "The Holyrood GT was operated for Island spinning reserve considerations during a planned outage to Holyrood Unit 2..." Later in the afternoon, Holyrood Unit 2 was returned to service and eventually loaded to approximately 70 MW, similar to Holyrood Unit 3. With such healthy reserves on the system, and Holyrood Unit 3 only operating at approximately 70 MW, why was it necessary to operate the Holyrood GT on this day?

NP-NLH-314 **Reference: Hydro's Recovery of the 2015 and 2016 Balances Application, response to Request for Information NP-NLH-030, Table 6, October 18, 2016.**

The Holyrood GT was operated from 5:00 PM through 10:00 PM on this date. Prior to starting the Holyrood GT the Island Spinning Reserve was approximately 220 MW, or 50 MW above the target of 170 MW. On-Line Avalon reserves were also in excess of 340 MW for the period in which the Holyrood GT operated. Also through this same period, Holyrood Units 2 and 3 operated at approximately 80 MW. In the comments for Table 6, Hydro states "*The Holyrood GT was operated during the evening peak period for Island spinning reserve considerations.*" Why was it not possible to adjust the loads on Holyrood Units 2 and 3 to make operating the Holyrood GT unnecessary?

NP-NLH-315 **Reference: Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, Appendix B, Specific Examples of the Requirement for Standby Generation, page 4, lines 2–3 and Figure 1.**

"During this week, standby generation was required to support both load and Island spinning reserves from December 28-30, 2015."

Complete the table below providing the maximum load on each unit. In light of the loads indicated, and the derating of Unit 1 to 155 MW, please explain why the 170 MW spinning reserve target in Figure 1 was appropriate.

Date	Holyrood Unit 1 (MW)	Holyrood Unit 2 (MW)	Holyrood Unit 3 (MW)
28-Dec-2015			
29-Dec-2015			
30-Dec-2015			

NP-NLH-316 **Reference: Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, Appendix B, Specific Examples of the Requirement for Standby Generation, page 5, lines 4-8.**

"Standby generation was operated throughout this period to support load, as well as Island and Avalon spinning reserve requirements. On January 6, 2016, Holyrood Unit 2 was taken out of service at 04:28 due to boiler tube issues. At the time, Holyrood unit 1 was de-rated to 155 MW. Figures 3 – 10 provide a depiction of the forecast requirement for standby production through this period."

Please explain why it was appropriate to use 170 MW as the spinning reserve target when Holyrood Unit 2 was out of service and, according to the information provided in the response to Request for Information NP-NLH-020 of the Recovery of the 2015 and 2016 Balances Application, Holyrood Unit 1 underwent significant deratings of between 50 and 120 MW.

NP-NLH-317 **Reference: Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, Appendix B, Specific Examples of the Requirement for Standby Generation, page 11, lines 3-6.**

"During this time the Island system was experiencing unit derating or unit unavailability, totaling 291 MW with Holyrood Units 1 and 2 both de-rated to 120 MW, Hardwoods de-rated to 38 MW, Stephenville End A unavailable at Stephenville, and Bay d'Espoir Units 1 and 2 unavailable."

Please explain why it was appropriate to use 170 MW as the spinning reserve target when both Holyrood Units 1 and 2 were derated to 120 MW.

NP-NLH-318 **Reference: Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, Appendix B, Specific Examples of the Requirement for Standby Generation, page 12, lines 2-4.**

"Higher load conditions during this time, with similar generation de-ratings as those experienced in the week of April 1-7, 2016, resulted in the operation of the Holyrood GT on April 18-21, 2016, to support Island and Avalon spinning reserve requirements."

Please explain why it was appropriate to use 170 MW as the spinning reserve target when both Holyrood Units 1 and 2 were derated to 120 MW.

NP-NLH-319 **Reference: Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, Appendix B, Specific Examples of the Requirement for Standby Generation, page 14, lines 3-6.**

"Hydro's reserve assessments determined that during this period the unit was required in order to protect against the contingency of a loss of a Holyrood unit and to maintain the system within static and dynamic limits, post-contingency."

Please explain why it was appropriate to use 150 MW as the spinning reserve target during this period.

NP-NLH-320 Please provide hourly loading for Bay d'Espoir Unit 7 through the September 26 – 29, 2016 period.

NP-NLH-321 **Reference: 2017 General Rate Application. Volume I (4th Revision), Chapter 3: Operations, Page 3.25, Lines 15-18.**

"*The reduced production forecast for Hydro's Island Interconnected System gas turbines and diesels for 2017 through to the 2019 Test Year reflect the reliability benefit of the planned in service of a third transmission line from Bay d'Espoir to Western Avalon (TL267)."*

Complete the table below to compare the production of the Avalon Peninsula based gas turbines in the 1st quarter of each year.

	2018 Q1	2017 Q1	2016 Q1	2015 Q1
Holyrood Gas Turbine				
Actual Starts				
Equivalent Starts				
Actual Operating Hours				
Hardwoods Gas Turbine				
Actual Starts				
Actual Operating Hours				

NP-NLH-322 **Reference: Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, Appendix B, Specific Examples of the Requirement for Standby Generation, page 14, lines 2-3.**

"During this week, standby generation was required to support Island spinning reserves and facilitate a planned outage to transmission line TL 237 from September 26-29, 2016."

Please explain why, with transmission line TL237 out of service, Figure 17 indicates that no standby units were required to be operated.

NP-NLH-323 **Reference: 2017 General Rate Application, response to Request for Information NP-NLH-038, Attachment 1, Establishing a Robust Operational Philosophy and Enhancing Skills and Capabilities Relating to Systems Reliability and Analysis, Page 10, lines 8-13.**

"*As part of these meetings, system reliability assessments, based on load forecasts for the current day and for the next seven days, are reviewed and discussed for both the Island Interconnected System and the Avalon Peninsula. These assessments outline the expected reserves based on the load forecast and the availability of assets which include primary generation, standby generation and in the case of the Avalon, transmission availability."*

Following the completion of the Daily System Status Meeting, how are changes that occur during the day with respect to load forecast and the availability of assets accounted for in the subsequent dispatch of primary and standby generation?

NP-NLH-324 **Reference: 2017 General Rate Application Hearing, Transcript, April 23, 2018, page 32.**

"They look at it and if they see something that's a little bit peculiar looking, they will go back and ask questions to the ECC, you know, why wasn't it shut down earlier, or why it was left on, or whatever."

Does Hydro have any specific procedures or measures in place to ensure that standby generation is not running longer than necessary?

NP-NLH-325 **Reference: Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, Appendix B, Specific Examples of the Requirement for Standby Generation, page 3, lines 5-10.**

"*As such, in consideration of the examples provided in this section, there are times when gas turbines have been dispatched on a forecast basis when on an actual basis the spinning reserve limit was not violated. There*

are also instances when the evidence would suggest additional generation should have been placed online based on actual spinning reserve, and this can also be as a result of changes in actual load compared to forecast."

Has Hydro reviewed these instances to ensure, to the extent possible, unnecessary cost is not incurred through the operation of standby generation when it is not needed? Have any process changes been implemented to ensure spinning reserve is provided at the lowest cost consistent with reliable service?

NP-NLH-326 **Reference: Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, Appendix B, Specific Examples of the Requirement for Standby Generation, page 1**

Are the Island Spinning Reserve Chart and the Standby Forecast for Avalon Reserves Chart set out in Appendix B produced every day and reviewed at the daily meeting described at page 10 of *Establishing a Robust Operational Philosophy and Enhancing Skills and Capabilities Relating to Systems Reliability and Analysis* (Attachment 1 to the response to Request for Information NP-NLH-038)?

NP-NLH-327 **Reference: Hydro's Recovery of the 2015 and 2016 Balances Application, response to Request for Information NP-NLH-020.**

Please update the response to NP-NLH-020 of the 2015 and 2016 Balances Application to include the derating history of Holyrood Units 1, 2 and 3 for 2017.

NP-NLH-328 **Reference: Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, Appendix B, Specific Examples of the Requirement for Standby Generation.**

For each of the Avalon Reserve Charts included in Appendix B, please provide a revised chart using threshold lines showing the largest actual load on an individual operating unit on the Avalon throughout the period.

NP-NLH-329 For each of the Island Spinning Reserve Charts included in Appendix B please provide a revised chart adding a third line for the actual generation available to contribute to spinning reserve and a fourth line showing the largest actual load on an individual operating unit throughout the period.

NP-NLH-330 **Reference: Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, Appendix B, Specific Examples of the Requirement for Standby Generation, page 2, lines 16-17.**

"*To plan operations for required spinning reserve, the Nostradamus forecast customer load is compared to available generation that can contribute to spinning reserve.*"

Complete the table below for the dates identified relating to the specific examples of standby generation.

Date	Actual Peak (MW)	Forecast Peak (MW)	Error (MW)	Percent Error (%)
3-Nov-2015				
4-Nov-2015				
28-Dec-2015				
29-Dec-2015				
30-Dec-2015				
4-Apr-2016				
5-Apr-2016				
6-Apr-2016				
7-Apr-2016				
18-Apr-2016				
19-Apr-2016				
20-Apr-2016				
21-Apr-2016				
26-Sept-2016				
27-Sept-2016				
28-Sept-2016				
29-Sept-2016				
26-Mar-2017				
27-Mar-2017				
28-Mar-2017				
29-Mar-2017				
30-Mar-2017				
31-Mar-2017				
1-Apr-2017				
19-Nov-2017				
21-Nov-2017				
22-Nov-2017				
23-Nov-2017				
24-Nov-2017				
3-Dec-2017				
4-Dec-2017				
5-Dec-2017				
6-Dec-2017				
Minimum				
Average				
Maximum				

NP-NLH-331 Complete the table below for the dates identified relating to the specific examples of standby generation. For each generator, identify the maximum loading that occurred for the period during which standby generation was operating in support of Island Reserve or Avalon Reserve.

Date	Holyrood Unit 1 (MW)	Holyrood Unit 2 (MW)	Holyrood Unit 3 (MW)	Bay d'Espoir Unit 7 (MW)
3-Nov-2015				
4-Nov-2015				
28-Dec-2015				
29-Dec-2015				
30-Dec-2015				
4-Apr-2016				
5-Apr-2016				
6-Apr-2016				
7-Apr-2016				
18-Apr-2016				
19-Apr-2016				
20-Apr-2016				
21-Apr-2016				
26-Sept-2016				
27-Sept-2016				
28-Sept-2016				
29-Sept-2016				
26-Mar-2017				
27-Mar-2017				
28-Mar-2017				
29-Mar-2017				
30-Mar-2017				
31-Mar-2017				
1-Apr-2017				
19-Nov-2017				
21-Nov-2017				
22-Nov-2017				
23-Nov-2017				
24-Nov-2017				
3-Dec-2017				
4-Dec-2017				
5-Dec-2017				
6-Dec-2017				

NP-NLH-332 **Reference: Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, Appendix B, Specific Examples of the Requirement for Standby Generation, page 3, lines 18-21.**

"*During this week, standby generation was required to support both load and Island spinning reserves on November 3, 2015 and November 4, 2015. Island spinning reserve would have been below the level required to sustain the loss of the largest online unit for both the morning and evening peak on both days.*"

At page 2 of 31 of Appendix L (Revision 2), the reason stated for operation of the Holyrood GT on both November 3rd and 4th was "Planned Avalon Peninsula transmission outages." Please confirm why the Holyrood GT was operated on those days.

NP-NLH-333 **Reference: Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, Pages 20, Table 6: Holyrood Gas Turbine 2015 Operating Data.**

Please confirm that the 28 actual starts and 205.5 actual operating hours in support of spinning reserve incurred a fuel cost of $2.9 million, as noted in the response to Request for Information NP-NLH-017 of the Recovery or 2015 and 2016 Balances Application.

NP-NLH-334 **Reference: Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, Pages 22, Table 8: Holyrood Gas Turbine 2016 Operating Data [revised].**

In Table 8, Hydro indicates that the Holyrood GT was operated for spinning reserve 54 times in 2016, for a total of 347.2 actual operating hours. Please provide the total cost of fuel consumed in operating the Holyrood GT in 2016 for spinning reserve.

NP-NLH-335 **Reference: Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, Pages 24, Table 10: Holyrood Gas Turbine 2017 Operating Data.**

In Table 10, Hydro indicates that the Holyrood GT was operated for spinning reserve 63 times in 2017, for a total of 629.9 actual operating hours. Please provide the total cost of fuel consumed in operating the Holyrood GT in 2017 for spinning reserve.

NP-NLH-336 **Reference: 2017 General Rate Application, response to Request for Information NP-NLH-038, Attachment 1, Establishing a Robust Operational Philosophy and Enhancing Skills and Capabilities Relating to Systems Reliability and Analysis, Page 2, lines 6-11.**

"*In 2016, Hydro experienced boiler tube issues at the Holyrood Thermal Generating Station (HTGS) and took deliberate actions to ensure minimal customer outages. The thermal generating units were run at lower loads and the gas turbines were started in advance to ensure service continuity. There was no visibility to cost recovery for the operation of the gas turbines; Hydro took this action solely to ensure reliability of the system for customers.*"

What is meant by the phrase "no visibility to cost recovery"?

NP-NLH-337 **Reference: Hydro's Recovery of the 2015 and 2016 Balances Application, response to Request for Information NP-NLH-016.**

Please update this response to include the average 2017 fuel cost, in ¢/kWh, for operating each of (i) the Holyrood thermal generating station, (ii) the Holyrood GT, (iii) the Hardwoods gas turbine, and (iv) the Stephenville gas turbine.

RESPECTFULLY SUBMITTED at St. John's, Newfoundland and Labrador, this 4th day of May, 2018.

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