

1 Q. Further to the response to IC-NLH-072, why, given the differences between
2 Newfoundland Power Inc.'s curtailable load and Newfoundland Power In.'s
3 generation capacity, would consideration be given to treating the curtailable load in
4 the same manner as Newfoundland Power Inc.'s generation capacity?

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7 A. In its response to IC-NLH-072, Hydro is indicating that, as part of its procedures to
8 deal with system emergencies such as a generation shortage or significant loss of
9 transmission and depending on the severity of the situation, Hydro may call upon
10 Newfoundland Power (NP) to interrupt its curtailable load. It is only treated in the
11 same manner as NP's generation capacity insofar as they are both steps in Hydro's
12 generation shortage procedure.

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14 Consideration should not be given to treating the curtailable load in the same
15 manner as NP generation capacity. The ability to dispatch NP's curtailable load does
16 not provide the same reliability as NP's generation capacity in terms of 'firmness',
17 i.e., customers can refuse to curtail their load. As well, the limitations with respect
18 to length of time that a customer can be curtailed at any one time (six hours), the
19 total curtailable time in any winter peak period (100 hours), and the required
20 advance notice for curtailment (one hour) may restrict its effectiveness in a system
21 emergency situation.