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Q. In NP's opinion, would Hydro benefit from the modification/introduction of procedures granting it control during system emergencies over Island generation that it does not own? Would greater control be beneficial, and what would be involved in obtaining the necessary control over Island generation Hydro does not own?

A. It is Newfoundland Power's opinion that under existing system operating procedures and practices Hydro effectively does have control over island generation that it does not own.

Newfoundland Power's generating units are operated under direction from Hydro during system generation capacity emergencies. Hydro operates and maintains the hydro generation facilities owned by the provincial government located on the Exploit's River and at Star Lake. It has been Newfoundland Power's experience that the two commercial wind generating facilities located in the province at Fermeuse and St. Lawrence have cooperated with Hydro when requested to maximize their generation output during times of system generation capacity constraint. Newfoundland Power's understanding is that the generating assets owned by Corner Brook Pulp and Paper (CBPP), namely the Deer Lake Power plant and the CBPP co-generation unit, are operated to maximum available output when requested by Hydro during times of system generation emergencies. As well, Newfoundland Power's understanding is that CBPP has cooperated with Hydro when requested to shed load to free up Deer Lake Power generating capacity to supply the island interconnected system during times of system emergencies.

It is Newfoundland Power's opinion that utilization of non-Hydro owned generation assets has not been an issue in recent year system generation capacity emergency events. Providing Hydro with greater control over generating assets owned by others would not seem to provide any significant advantage over existing practices.