

- 1 **Q:** (Liberty December 17, 2014 Report to Board on *Supply Issues and Power*
2 *Outages Review Island Interconnected System* addressing Newfoundland Power
3 Inc.) The report states (page 91): “*Newfoundland Power and Hydro are not*
4 *technically able to measure the actual amount of electricity that consumers*
5 *conserve after a conservation request*”. Why not? Are they able to provide a
6 reasonable estimate? How do other utilities make such
7 measurements/estimates?
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- 10 **A.** This statement is based on Newfoundland Power’s response to PUB-NP-014.
11 Liberty has no information on how other utilities measure curtailments or on the
12 question of whether the companies have an alternate basis for providing such
13 estimates.