

1 **Q. Re: Brockman report, Table 1 (“Reserve Analysis”), page 13**

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3 **Preamble: The referenced table indicates supply of 673 MW from the LIL, starting**
4 **in the Post-Muskrat period. Footnote 24 references PUB-NLH-217.**

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6 **Please confirm that the values in the table represent firm capacity.**

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8 **Are there any other sources on which you rely with respect to the availability of**
9 **673 MW of firm capacity over the LIL starting in the post-Muskrat period?**

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11 A. With the exception of the 673 MW from the LIL in the Post-Muskrat periods, the capacity
12 values relied upon by Mr. Brockman in Table 1 of his report were sourced from Hydro’s
13 *Energy Supply Risk Assessment* final report. Details and assumptions relating to these
14 capacity values are provided in Section 7 and Appendix A of Hydro’s report. The extent to
15 which Hydro considers this capacity to be ‘firm’, particularly with respect to the 300 MW
16 of capacity from the Maritime Link, is not fully explained in Hydro’s report.

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18 Mr. Brockman relied upon information provided by Hydro with respect to availability of
19 673 MW of capacity on the LIL to serve load on the Island Interconnected System (“IIS”).
20 This information was primarily sourced in responses to requests for information. For
21 example, in the response to Request for Information PUB-NLH-217 Hydro states:

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23 *“A full loss of the LIL, referred to as a permanent bipole failure, will result in*
24 *immediate curtailment of the export of the Nova Scotia capacity and loss of a*
25 *maximum of 673 MW of capacity on the Island Interconnected System. The loss of*
26 *673 MW to the Island Interconnected System will require load shedding of up to*
27 *673 MW in order to rebalance on Island generation with load and return system*
28 *frequency to normal.”¹*

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30 Several other responses to requests for information also refer to 673 MW of capacity on the
31 LIL being available to serve load on the IIS.²

¹ See Page 8, Lines 19-24 of the response to Request for Information PUB-NLH-217.

² See the responses to Requests for Information CA-NLH-030, CA-NLH-128, CA-NLH-130, GRK-NLH-068, GRK-NLH-125, GRK-NLH-136, PUB-NLH-236, PUB-NLH-277, PUB-NLH-447, and PUB-NLH-504.