

1 Q. **Reference: Evidentiary Update, Table 2, Pages 5 and 6**

2 So that the impact of load can be better ascertained, please provide expansion plan analysis for
3 scenarios similar to 4AE, 4AEC, 4AEDC, 4AEHC, 4AEDHC and 4AEKC with the only difference
4 being the assumption that IIS load remains constant at the 2025 load. Please present the results
5 in the same format as Table 2.

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8 A. Within the Settlement Agreement reached among the parties to the *Reliability and Resource*
9 *Adequacy Study Review* proceeding and 2024 Resource Adequacy Plan, the parties agreed that
10 Newfoundland and Labrador Hydro's ("Hydro") load forecasting methodology is consistent with
11 utility industry standards,¹ and that the Minimum Investment Expansion Plan, which is based on
12 the Slow Decarbonization load forecast results, indicates a minimum of 385 MW of new capacity
13 is required by 2034. The parties agreed that at any hearing pertaining to the addition for Bay
14 d'Espoir Unit 8 and the Avalon Combustion Turbine ("Avalon CT"), the parties do not intend to
15 examine, cross examine, or present argument with respect to the Settled Issues beyond that
16 which is reasonably necessary to assist the Board of Commissioners of Public Utilities' ("Board")
17 understanding and recommended that the Board accept the Settlement Agreement during the
18 Board's evaluation of Hydro's application to construct these assets. The Settlement Agreement
19 was filed as Schedule 2 to the 2025 Build Application.

20 The parties also agree within the Settlement Agreement that the 2023 Load Forecast for the
21 Island Interconnected System provides a reasonable range of provincial load growth over the

¹ Please refer to item 1 of the Settled Issues, Attachment 1 to the Settlement Agreement provided in "2025 Build Application – Bay d'Espoir Unit 8 and Avalon Combustion Turbine," Newfoundland and Labrador Hydro, March 21, 2025, sch. 2.

1 2023–2034 period.² The load forecast is updated annually, and both the 2024³ and 2025⁴ Island
2 Interconnected System Load Forecast reports have been filed with the Board.

3 Hydro further notes that the Avalon CT Evidentiary Update utilized a simulation period starting
4 in 2026,⁵ instead of 2025 as in previous analysis. Hydro believes it is unlikely and not a
5 reasonable assumption that demand would remain unchanged from 2025 or 2026 through to
6 2035.

² Please refer to item 3 of the Settled Issues, Attachment 1 to the Settlement Agreement provided in “2025 Build Application – Bay d’Espoir Unit 8 and Avalon Combustion Turbine,” Newfoundland and Labrador Hydro, March 21, 2025, sch. 2.

³ Please refer to “2025 Build Application – Bay d’Espoir Unit 8 and Avalon Combustion Turbine,” Newfoundland and Labrador Hydro, March 21, 2025, sch. 3, app. A.

⁴ Hydro’s 2025 Island Interconnected System Load Forecast Report is available on the Board’s website at <http://www.pub.nl.ca/applications/NLH2018ReliabilityAdequacy/reports/From%20NLH%20-%202025%20Island%20Interconnected%20System%20Load%20Forecast%20Report%20-%202025-11-05.PDF>.

⁵ The simulation period utilized the 2025 Load Forecast update in the Avalon CT Evidentiary Update.