

1 Q. (Reference Bates White Expert Addendum Report of Vincent Musco and Collin Cain,  
2 June 5, 2026) Bates White reiterates (page 27) that *“the Slow Decarbonization forecast*  
3 *is not the lowest plausible load scenario over the planning horizon—lower population*  
4 *growth, lower electric vehicle adoption rates, and lower industrial load growth are all*  
5 *possible and may coincide.”* Does Bates White agree that adoption of seasonal and/or  
6 TOU rates based on all-in-marginal cost could also lead to a materially lower load  
7 forecast, considering that the all-in marginal cost has been estimated at \$211 per MWh  
8 for the four winter months and \$37 per MWh for the other months? (See Christensen  
9 Associates, September 16, 2024, Report for Newfoundland and Labrador Hydro in  
10 Application for Adjustment to Wholesale Utility Rate, Schedule1, Attachment 1).  
11

12 A. Seasonal and/or TOU rates can affect forecasted load by season and time of day. The  
13 materiality of the effect with respect to Hydro’s resource planning is not quantifiable  
14 based on the evidence in this matter. As described in Hydro’s 2025 load forecast:  
15

16 The underlying electricity rate used in developing the 2025 Load Forecast  
17 aligns with the Government’s publicly announced finalized rate mitigation  
18 plan. The plan ensures domestic residential rate increases by Hydro are  
19 targeted at 2.25% annually and provides clarity on Hydro’s annual electricity  
20 rate increases associated with the Muskrat Falls Project up to and including  
21 2030. Hydro will work with the Government in advance of 2030 to determine  
22 future rate mitigation requirements once more information on the landscape  
23 of the electricity sector in that period is known. The electricity rate also  
24 incorporates the cost of the resources identified in the Minimum Investment  
25 Required Expansion Plan from the 2024 Resource Adequacy Plan. This  
26 underlying rate forecast assumption was used in all three scenarios for the  
27 2025 Load Forecast.<sup>1</sup> [footnotes omitted]

---

<sup>1</sup> 2025 Island Interconnected System Load Forecast Report, November 5, 2025, page 4, line 19, through page 5, line 3.