Q. With reference to IC-NLH-011, please confirm that absent the limitation represented by the Technical Conference #3 presentation slide 47, the energy criteria would be easily met with the import capability over LIL in all years of the planning sequence. If not, please provide an analysis of the energy criteria constraint assuming this limitation was not a constraint, and update Table 3 (page 44 of the RAP Overview) assuming this limitation was not a constraint.

A. If the Labrador-Island Link ("LIL") to Maritime Link relationship is excluded from consideration when conducting the firm energy analysis on an annual basis, there is no energy deficit projected through the planning horizon (2025–2034) for scenarios considering the Slow Decarbonization load forecast or the Reference Case load forecast. However, a small deficit is projected for 2033 and 2034 under the Accelerated Decarbonization load forecast scenario, as shown in Table 1. In this analysis, the firm Muskrat Falls energy is used; however, it is unlikely that a critical dry sequence would occur on both the Island and in Labrador simultaneously, so it may be more appropriate to use the average Muskrat Falls energy. The difference between firm and average energy from the Muskrat Falls station is approximately 400 GWh per year, which would eliminate the energy deficit in the Accelerated Decarbonization load forecast scenario as well.

Table 1: Firm Energy Load Resource Balance Excluding the LIL to Maritime Link Relationship[1]

	2025	2026	2027	2028	2029	2030	2031	2032	2033	2034
IIS[2] Generating Resources	8,550	8,550	8,537	8,537	8,537	6,111	5,362	5,362	5,362	5,310
Muskrat Falls and Churchill Falls Energy Available on the Island	5,499	5,494	5,491	5,490	5,486	5,480	5,476	5,469	5,462	5,455
Maritime Link Firm Export	(1,039)	(951)	(822)	(824)	(822)	(822)	(822)	(824)	(822)	(822)
Total IIS Firm Energy	**13,009**	**13,092**	**13,206**	**13,202**	**13,200**	**10,769**	**10,016**	**10,006**	**10,002**	**9,943**
Slow Decarbonization Load Forecast										
IIS Energy Requirement (incl. losses)	8,445	8,437	8,465	8,530	8,660	8,700	8,744	8,825	8,910	8,994
IIS Firm Energy Surplus/ (Deficit)	4,564	4,656	4,741	4,673	4,540	2,069	1,273	1,181	1,092	949
Number of 100 MW (350 GWh) Wind Projects	-	-	-	-	-	-	-	-	-	-
Reference Case Load Forecast										
IIS Energy Requirement (incl. losses)	8,542	8,582	8,634	8,722	8,884	8,982	9,073	9,204	9,341	9,478
IIS Firm Energy Surplus/ (Deficit)	4,467	4,510	4,571	4,481	4,316	1,787	943	802	661	465
Number of 100 MW (350 GWh) Wind Projects	-	-	-	-	-	-	-	-	-	-
Accelerated Decarbonization Load Forecast										
IIS Energy Requirements (incl. losses)	8,647	8,781	8,859	9,016	9,248	9,388	9,540	9,777	10,031	10,220
IIS Firm Energy Surplus/ (Deficit)	4,362	4,311	4,347	4,186	3,952	1,381	476	229	(29)	(277)
Number of 100 MW (350 GWh) Wind Projects	-	-	-	-	-	-	-	-	1	1

[1] Numbers may not add due to rounding.
[2] Island Interconnected System ("IIS").

The 2024 Resource Adequacy Plan presented the capacity and energy requirements by scenario.[3] Table 2 presents the firm energy requirement excluding the LIL to Maritime Link relationship. As shown, there is only a firm energy deficit in the three scenarios which consider the Accelerated Decarbonization load forecast scenario. The 0.4 TWh is rounded up from the 350 GWh assumed to be supplied by a single 100 MW wind project. In fact, the actual deficit in 2034 is only about 280 GWh as shown in Table 1.

Table 2: Recreation of Table 3 Excluding the LIL to Maritime Link Relationship

Scenario	Incremental Firm Energy Requirements (TWh, 2034 vs 2024)
1: Reference Case	-
2: Higher Growth than Reference Case	0.4
3: Slower Growth than Reference Case	-
4: Minimum Investment Required	-
5: Maximum Investment Required	0.4
6: Increased Electrification	0.4
7: Improved Reliability	-
8: LIL as an Energy-Only Line	-

[3] "2024 Resource Adequacy Plan – An Update to the Reliability and Resource Adequacy Study," Newfoundland and Labrador Hydro, rev. August 26, 2024 (originally filed July 9, 2024), 2024 Resource Plan Overview, p. 44, Table 3.