

1 Q. Explain the impacts, if any, that adding Battle Harbour Data Solutions Inc. as a non-firm
2 customer will have on the availability of non-firm capacity to its current non-firm customers and
3 its Labrador Industrial customers.

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6 A. In Newfoundland and Labrador Hydro's ("Hydro") Application for a Non-Firm Rate in Labrador,¹
7 filed March 29, 2023, Hydro noted that in discussion with the service applicants, Hydro
8 proposed to share equally the available non-firm capacity among the customers that avail of
9 non-firm service. As outlined in Table 2 of that Application, the available non-firm capacity
10 would be shared among each applicant. All non-firm interconnections in Labrador West are
11 designed for 12.5 MW, reflecting the maximum non-firm capacity expected to be deliverable at
12 a single interconnection, subject to system conditions, based on the non-firm capacity available
13 as of the date of the application for a Non-Firm rate.

14 Table 1 of Hydro's response to PUB-NLH-002 of this proceeding demonstrates the amount that
15 each customer could potentially avail of in each season depending on how many customers are
16 interconnected up to the four customers that had confirmed interest at the time of the Non-
17 Firm Rate Application. Once there are two customers connected, the customer that was
18 connected initially will share in the amount of available non-firm capacity, as outlined and
19 approved in the application for the Non-Firm Rate for Labrador. As noted in Hydro's response to
20 PUB-NLH-003, the amount of available non-firm capacity at any given time is shared equally
21 among the customers connected at that time, up to their technical limits.

22 The addition of Battle Harbour, or any other non-firm customer, does not impact the availability
23 of non-firm capacity to Labrador Industrial customers. As set out in Hydro's Application for Non-
24 Firm Rate for Labrador, the priority order for serving load is stated below.

¹ "Application for a Non-Firm Rate for Labrador," Newfoundland and Labrador Hydro, rev. March 29, 2023 (originally filed September 15, 2022), approved in Board Order No. P.U. 34(2023).

- 1 • Firm town loads;
- 2 • Firm Industrial Customer Loads up to the contracted Power on Order;
- 3 • Interruptible Industrial Customer Loads up to contracted amounts;
- 4 • Non-Firm Rate Customer Loads up to the interconnection limit of their interconnections;
- 5 and
- 6 • Equal sharing of any additional excess capacity between Industrial customers and non-firm
- 7 rate customers.