

- 1 Q. Further to Table 1 provided in the response to PUB-NLH-001:
- 2 a) For the period 2027 to 2031, provide the forecast non-firm energy available for BlockChain  
3 Labrador Corp. and Battle Harbour Data Solutions Inc. by seasonal period.
- 4 b) Further to the response in a), and using the forecast maximum demand requirements of  
5 BlockChain Labrador Corp. and Battle Harbour Data Solutions Inc., provide the forecast load  
6 factor for each customer for the same time frame and by seasonal period.
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- 9 A. Newfoundland and Labrador Hydro's ("Hydro") Application for a Non-Firm Rate for Labrador  
10 ("Non-Firm Rate Application"),<sup>1</sup> approved in Board of Commissioners of Public Utilities ("Board")  
11 Order No. P.U. 34(2023) was based on Hydro's determinations as described in its report  
12 "Feasibility of the Addition of a Non-Firm Rate Option to the Network Additions Policy for the  
13 Labrador Interconnected System."<sup>2</sup> That report considered whether a non-firm rate on the  
14 Labrador Interconnected System would be feasible. While the report concluded that a non-firm  
15 rate was feasible, it was for a limited number of customers who would accept that the delivery  
16 of energy may be interrupted at any time, that increased usage by customers on the Labrador  
17 Interconnected System with firm service will be prioritized, and that the amount of non-firm  
18 service may decline over time. Hydro had discussed these aspects of the potential non-firm rate  
19 with applicants for service to assess their potential interest.
- 20 While the non-firm rate is for the sale of energy to a customer, it is constrained by, among other  
21 things, the amount of excess capacity available in Labrador. The available non-firm capacity is  
22 contingent on the firm load requirements for the regions and is therefore seasonal in nature. It  
23 is also contingent on the firm load requirements at any given time, and by definition, is

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<sup>1</sup> "Application for a Non-Firm Rate for Labrador," Newfoundland and Labrador Hydro, rev. March 29, 2023 (originally filed September 15, 2022).

<sup>2</sup> *Supra*, f.n. 1, sch. 1, att. 1.

1 interruptible at any point in time when the firm load requirements require more or all of the  
2 available transmission capacity.

3 To provide applicants and the Board with a general idea of the amount of non-firm load that  
4 could be added to each region by season, Hydro provided an indicative table in its evidence for  
5 the Non-Firm Rate Application.<sup>3</sup> As Hydro noted, the actual number of interruptions and the  
6 amount of non-firm load that can be supplied is dependent upon variability in firm load  
7 requirements and the flexibility of non-firm customers to manage service interruptions that  
8 would be required to ensure Hydro satisfies its firm service obligations. As Hydro had non-firm  
9 service load requests in excess of the non-firm capacity projected to be available, in discussion  
10 with the service applicants, Hydro proposed to share equally the available non-firm capacity  
11 among the customers that avail of non-firm service. Table 2 of Hydro's evidence in the Non-Firm  
12 Rate Application provided the projected allocation of non-firm capacity for each individual  
13 applicant that continued to express an interest in non-firm service on the Labrador  
14 Interconnected System; however, it is important to note that, like the first table, this was  
15 intended only to be a projection for discussion. The available non-firm capacity, generally, or for  
16 each applicant, would continue to be subject to the variability in firm load requirements. As  
17 Hydro noted in its application at that time, there may be times when Hydro could permit non-  
18 firm customers to use more than what would be an equal share of the available non-firm  
19 transmission capacity, and there may be times when the non-firm customer may not be able to  
20 access any non-firm transmission capacity. The estimates provided were based on assumptions  
21 regarding acceptable interruption frequency<sup>4</sup> and historical operating patterns, recognizing that  
22 actual availability could vary materially based on system conditions. In practice, the availability  
23 of non-firm power can only be determined in real-time and depends on a range of dynamic  
24 factors, including system load, generation availability, transmission constraints, and asset  
25 performance. As approved by the Board, non-firm load is the first to be curtailed when system  
26 conditions require.

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<sup>3</sup> *Supra*, f.n. 1, sch. 1, sec. 2.1, p. 3.

<sup>4</sup> The analysis was based on a premise that a maximum of 50 interruptions would provide an acceptable limit for customers and for reliable system operation.

1           Based on the foregoing, it would be misleading to provide the information requested, even if a  
2           reasonably reliable estimate for that time frame could be made. The customer making the  
3           request for non-firm service is aware of the terms of the rate and the particulars of the service.  
4           The information requested would not assist in clarifying whether Hydro's application to request  
5           a contribution from that customer for the interconnection costs related to its connection should  
6           be approved.