

1 Q. In Order No. 34(2023) allocation of non-firm power was not determined. Further to the
2 response to PUB-NLH-003, provide the reference from the non-firm policy or the non-firm rate
3 sheets for the statement that “The terms of the non-firm rate stipulate that the amount of
4 interruptible load is to be divided equally among the non-firm customers, up to their technical
5 limits”.

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8 A. The implementation of the Non-Firm Rate was addressed in the process surrounding
9 Newfoundland and Labrador Hydro’s (“Hydro”) Application for a Non-Firm Rate for Labrador
10 (“Non-Firm Rate Application”),¹ approved in Board of Commissioners of Public Utilities Order
11 No. P.U. 34(2023). The present application does not seek to revisit those determinations;
12 however, Hydro confirms that the intent of the Non-Firm Rate is that the available non-firm
13 capacity would be shared among the customers that avail of non-firm service. This was noted at
14 Section 12 of Hydro’s Non-Firm Rate Application, as well as detailed in Schedule 1 to that
15 application.² Hydro had noted that, as Hydro had non-firm service load requests in excess of the
16 non-firm capacity projected to be available, Hydro had discussed this issue with the service
17 applicants and proposed to share equally the available non-firm capacity among the customers
18 that avail of non-firm service. Further, Hydro had proposed that if a non-firm customer were to
19 discontinue service, the remaining non-firm customers in the same region would be provided
20 the option to share equally in the newly available non-firm capacity. The Non-Firm Rate states,
21 at Section 16, that “If a non-firm customer discontinues service, the remaining existing non-firm
22 customers in the same region will be provided the option to share equally in the newly available
23 non-firm capacity.”

¹ “Application for a Non-Firm Rate for Labrador,” Newfoundland and Labrador Hydro, rev. March 29, 2023 (originally filed September 15, 2022).

² *Supra*, f.n. 1, sch. 1, p. i/12–15 and sch. 1, p. 4/1–3.

- 1 It was the calculation of the proposed equal sharing of the projected non-firm capacity among
- 2 the customers that had expressed interest and intent to avail of non-firm service that was the
- 3 basis for Hydro's standard configuration for non-firm service in Labrador.