

1 Q. **Reference: Exhibit 16, page 8**

2 Hydro states that *“By the year 2032, the most loss-of-load risk occurs during the winter period,*  
3 *coinciding with LIL outages.”*

4 a) What is the risk of loss-of-load in 2029 during the winter and non-winter months, and  
5 how much of this is attributable to i) LIL outages, and ii) Holyrood outages?

6 b) What is the risk of loss-of-load in 2029 during a LIL Shortfall Event?

7 c) Given that most loss-of-load risk coincides with LIL outages, why is it necessary to have a  
8 LIL shortfall event criterion in addition to the LOLH criterion?

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11 A. The requested information relates specifically to Newfoundland and Labrador Hydro’s (“Hydro”)   
12 2025 Build Application<sup>1</sup> and *Reliability and Resource Adequacy Study Review* proceeding. It is  
13 Hydro’s opinion that the information requested is not necessary for a satisfactory understanding  
14 of the matters to be considered in the 2026 General Rate Application as required by the *Board*  
15 *of Commissioners of Public Utilities Regulations, 1996.*

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<sup>1</sup> “2025 Build Application – Bay d’Espoir Unit 8 and Avalon Combustion Turbine,” Newfoundland and Labrador Hydro, March 21, 2025.