

1 **Q. Reference: Response to PUB-NLH-108**

2 Hydro identifies four reasons for requesting that Newfoundland Power maximize hydraulic
3 generation: economic dispatch before increasing loading on Holyrood units, support for system
4 reserves, facilitating equipment outages, and offsetting transmission corridor limits.

5 **a)** For each dated observation in PUB-NLH-108, Attachment 1, identify which of the four
6 reasons prompted the request.

7 **b)** Provide a re-derived hydraulic credit using only those observations in which a request to
8 maximize all hydraulic generation was issued in support of system reserves, and provide
9 the mean, median, and tenth-percentile (P90) value of that restricted sample.

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12 **A. a)** For all dated observations in PUB-NLH-108, Attachment 1, Newfoundland Power Inc.
13 ("Newfoundland Power") was requested to maximize hydraulic generation in support of
14 system reserves, with the following exceptions:

- 15 • December 20, 2015;¹
- 16 • February 9, 2017;
- 17 • January 9, 2018; and
- 18 • February 21, 2019.²

19 **b)** The proposed hydraulic generation credit was derived using only those observations in
20 which Newfoundland Power was requested to maximize hydraulic generation in support of
21 system reserves. As noted in the response to part a), the observations of
22 December 20, 2015, February 9, 2017, January 9, 2018, and February 21, 2019 were not

¹ Identified as "N/A" in the table, as there was no Energy Control Center ("ECC") request associated with this observation.

² The latter three observations are also identified as "N/A" in the table because the ECC request was specifically for Avalon Hydro. Requests for Avalon Hydro are often indicative of efforts to offset transmission corridor limits rather than to support system reserves. As a result, these observations have not been categorized as requests to maximize generation in support of system reserves.

1 associated with requests made in support of system reserves and, accordingly, were not
2 utilized in determining the generation credit.

3 Therefore, no re-derivation of the hydraulic generation credit is required, as the proposed
4 generation credit already reflects a sample restricted to observations where requests to
5 maximize hydraulic generation were issued in support of system reserve requirements. The
6 mean, median, and tenth-percentile (P90) values underlying the proposed generation credit
7 are therefore based exclusively on observations associated with requests in support of
8 system reserves.