

1 Q. **Re: May 18, 2018 Application regarding Confidential Information contained in**
2 **Table 2 of Hydro’s Response to PUB-NLH-149**

3 In clause 11 Hydro states *“if a supplier was able to use the information in Table 2 to*
4 *deduce what NEM was willing to pay for energy under a bilateral transaction with*
5 *one company, then it would impair NEM's ability to negotiate a better price with*
6 *other competitors.”* Why is it problematic that competitive suppliers know what
7 NEM was willing to pay for power in the past when they are competing with other
8 suppliers at a particular point in time to make a profit on a sale? Why is this
9 information confidential when NEM is not identifying the supplier or any of the
10 terms and conditions of bilateral contracts?

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13 A. Knowing what Nalcor Energy Marketing (NEM) was willing to pay in the past, and
14 under a certain set of circumstances, would be a key determinant in establishing a
15 bidding strategy to offer to NEM at a particular point in time. It provides insight into
16 what NEM was willing to pay and the price at which a competing supplier was
17 willing sell the energy. This is the kind of information that is highly confidential in a
18 competitive market and would impair NEM's ability to negotiate a better price with
19 other competitors.