

1 Q. Page 12, lines 1-2. Mr. Browne states that the primary reason Hydro is proposing  
2 the Off Island Purchases Deferral Account is to deal with the uncertainty in  
3 estimating the pre-commissioning savings arising from use of the LIL and LTA prior  
4 to Muskrat Falls commissioning. What information or evidence did Mr. Browne rely  
5 on for this conclusion? In the response include references to any sections of Hydro’s  
6 application or other information on the record in this proceeding that lead to this  
7 conclusion.

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10 A. This response has been provided by JT Browne Consulting.

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In developing his opinion, Mr. Browne relied on Hydro to provide him with relevant information related to Hydro and the Muskrat Falls Project. This information was summarized in the Background Section of his evidence.

16 As part of this process, Hydro provided Mr. Browne with selected documents that  
17 have been submitted as part of this hearing process, such as Hydro’s response to  
18 various Requests for Information. Mr. Browne also reviewed information that is  
19 publicly available on the internet, such as Nalcor’s financial statements and sections  
20 of the Transmission Funding Agreement. However, Mr. Browne ultimately relied on  
21 Hydro. For example, Mr. Browne had Hydro review the Background Section of his  
22 evidence and made changes based on information Hydro provided to him.

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Mr. Browne also reviewed segments of annual reports in preparing “Exhibit JTBC-2” of his evidence. The annual reports relied on in developing this exhibit are identified in the footnotes.