Q. Reference: 2018 Cost of Service Methodology Review Report dated November 15, 2018 1 2 3 On page 11 (lines 13 to 14) it is stated "Hydro proposes to continue to use system load factor for classification of its existing hydraulic based generation." Page 17 (lines 15 – 20) of 4 5 the CA Energy Consulting Report states "Additionally, if the equivalent peaker approach, 6 with its grounding in system planning, appeals conceptually to Hydro, the utility may wish to consider applying this approach to its entire fleet of Interconnected generation. The 7 8 theoretical advantage is that each unit is judged for its demand and energy components 9 under the same set of assumptions. The challenge is to compute the current value of each generation unit. (Indexes like the Handy-Whitman are available for this purpose.)" Is 10 computing the current value of each generating unit using indexes like Handy-Whitman any 11 12 more challenging than the computation that Hydro now carries out for specifically-assigned 13 O&M costs? Please explain. 14

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16 Α. Completing the current value of each of Newfoundland and Labrador Hydro's ("Hydro") 17 generating units using indexes like Handy-Whitman requires a similar degree of effort as 18 the computation of indexed transmission assets. However, there are additional steps in 19 completing the equivalent peaker analysis. Hydro would have to determine an economic 20 carrying charge in \$/kW for each hydraulic generating facility by applying the economic 21 carrying charge investment rate to the hydraulic facilities current dollar investment 22 including appropriate rate base adjustments (i.e., general plant, materials and supplies and 23 working capital). Hydro would also need to determine appropriate revenue requirement 24 loaders to determine the total cost per kW for each hydraulic generating facility (such as 25 insurance, fixed operating and maintenance and administration and general cost) to arrive 26 at the total carrying charge.