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The use of diesel units or gas turbines to produce energy is tied to peak 1 Q: 2 loadings during winter periods. Although the fuel produces energy, it is energy 3 tied to use in a specific high load hour. Absent a high load in this hour, the turbines and diesel units would not be used. 4 5 6 Please discuss whether these facts would lead the Brattle Group to conclude 7 that, for diesel units and gas turbines fuel costs, a CP allocator is more 8 appropriate, or alternatively a classification to 100% energy, but with 9 allocation based on, for example, relative energy use over only the key winter 10 months. 11 12 No, the stated facts would not lead us to conclude that, for diesel units and gas A. 13

A. No, the stated facts would not lead us to conclude that, for diesel units and gas turbine fuel costs, a CP allocator is more appropriate or alternatively a classification to 100% energy, but with allocation based on relative energy use over only the key winter months.

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