Q. Reference Prefiled Evidence of Larry Brockman, page 12, lines 4-7:

(i) Please provide citations in the cost of service literature that supports Mr. Brockman's position that the equivalent peaker method is a superior method for a generation investment selected primarily on fuel savings over the long run.

(ii) How many utilities in Canada use the equivalent peaker method for their: 1) hydro; and 2) non-hydro generation resources? Please provide citations.

(iii) How many utilities in the United States use the method for their: 1) hydro; and 2) non-hydro generation resources? Please provide citations.

(iv) Is it Mr. Brockman's position that the equivalent peaker method is a commonly-used method for classification purposes for hydro generation resources? What about for non-hydro generation resources?

A. (i) Mr. Brockman's position as stated is Mr. Brockman's expert opinion based on his experience. He has not conducted an exhaustive review of cost of service literature on the issue.

(ii) Mr. Brockman is aware that, until recently, SaskPower used the equivalent peaker method to classify generation costs. However, following a 2017 cost of service review, SaskPower accepted a recommendation that it discontinue using the equivalent peaker method for classification of generation resources and adopt the average and excess demand method.

(iii) Mr. Brockman is aware of only one state (Wisconsin) where the equivalent peaker method is one of a range of methods of classifying production costs considered by the Public Service Commission in determining the final allocation of revenue requirement. See, for example, Docket No. 6690-UR-124.

(iv) It is not Mr. Brockman's position that the equivalent peaker method is a commonly-used method for classification purposes for either hydro or non-hydro generation resources.