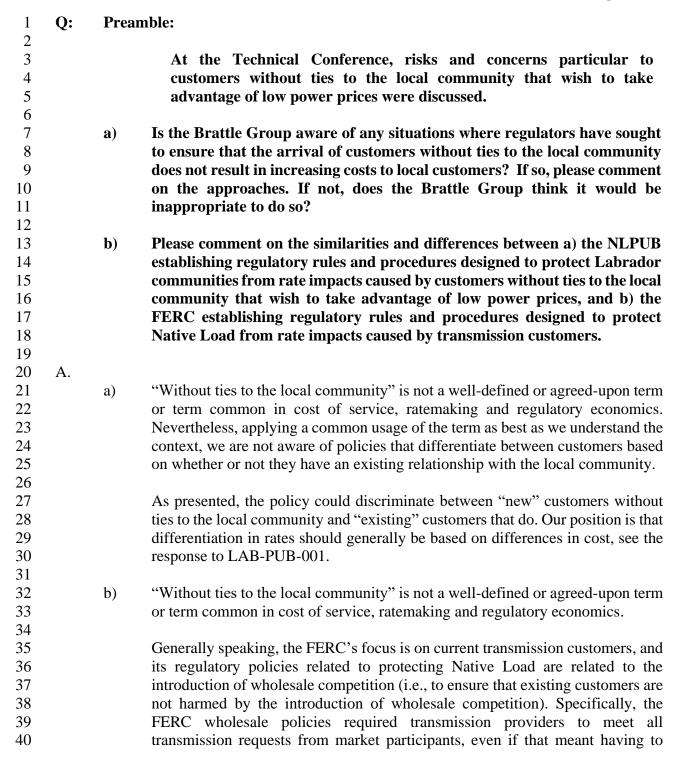
Page 1 of 2



Page 2 of 2

1 build facilities to accommodate the request. The requests were from market 2 participants—generators and load—taking advantage of wholesale competition. 3 The genesis of FERC policy was on protecting Native Load from the added costs 4 required—e.g., transmission investments—to allow for and facilitate wholesale 5 competition. 6 7 In contrast, the genesis of this proceeding on Network Addition Policies is not 8 focused on competition per se, it is on how best to treat and allocate the costs of 9 transmission investment required to meet Native Load demand and specifically 10 how to deal with unanticipated demand. Because we understand most customers 11 connect at the distribution voltage levels, most customers affected by this policy 12 would be treated as "native load" from the perspective of a requirement to 13 provide service. For the reasons we discussed in our report Review of Existing and Proposed Network Additions Policies for Newfoundland and Labrador 14 15 Hydro and given the benchmarking evidence we presented, we believe our recommended approach results in an economically efficient way to deal with 16 17 network additions in Labrador.