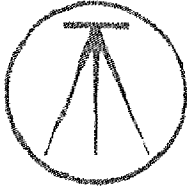


- 1 Q. Please provide a copy of the report filed by Mr. George C. Baker in the proceeding  
2 relating to the Referral by NLH for the proposed cost of service methodology, which  
3 resulted in the 1993 report produced as PUB-NLH-113, Att. 1, as mentioned on  
4 pages 61 and 62 of said report.  
5  
6  
7 A A copy of the direct testimony of G. C. Baker (Revised December 10, 1993) and  
8 SUPPLEMENTARY TESTIMONY OF G. C. BAKER filed in the proceeding to the  
9 Referral by Newfoundland and Labrador Hydro for the proposed Cost of Service  
10 Methodology is attached.



*Hiltz and Seamone* COMPANY LIMITED

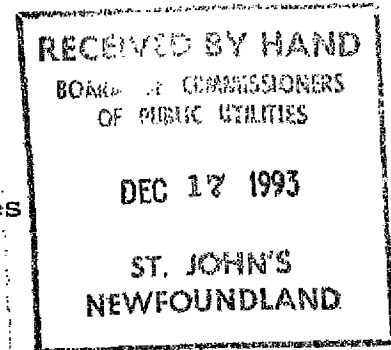
CONSULTING ENGINEERS AND SUPERVISORS

Telephone (902) 678-2774  
FAX (902) 678-6990

536 Main Street  
Kentville, Nova Scotia  
B4N 1L3

December 13, 1993

Ms. Carol Horwood  
Clerk  
Newfoundland & Labrador  
Board of Commissioners of Public Utilities  
P. O. Box 21040  
St. John's, Newfoundland  
A1A 5B2



Dear Ms. Horwood:

With this letter I submit 25 copies of revised direct testimony and supplementary testimony in the matter of an inquiry into issues relating to the supply of electricity to isolated rural areas of the Province.

Revisions are as follows:

- Page 16, line 14: words added.
- Page 23, line 8: words changed.
- Page 25, line 14, to page 26, line 3: text revised.
- Page 26, line 19: typographical correction.

(The above line references are to the original text.)

The revised direct testimony and the supplementary testimony are consolidated into one document, complete with all exhibits and appendices. To avoid the possibility of confusion, it is requested that recipients destroy the original version of the direct testimony after receipt of the revised text.

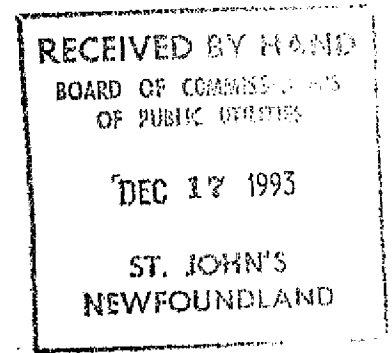
Would you please distribute this material to the appropriate parties.

Yours sincerely,

G. C. Baker, P. Eng.

GCB/db





PROVINCE OF NEWFOUNDLAND

BOARD OF COMMISSIONERS OF PUBLIC UTILITIES

IN THE MATTER OF:

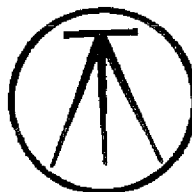
An inquiry into issues relating to the supply of electricity to  
isolated rural areas of the Province.

DIRECT TESTIMONY OF G. C. BAKER

(Revised December 10, 1993)

AND

SUPPLEMENTARY TESTIMONY OF G. C. BAKER



HILTZ & SEAMONE CO. LTD.  
ENGINEERS  
KENTVILLE, N. S.

**PROVINCE OF NEWFOUNDLAND**

**BOARD OF COMMISSIONERS OF PUBLIC UTILITIES**

**IN THE MATTER OF:**

**An inquiry into issues relating to the supply of electricity to  
isolated rural areas of the Province.**

**DIRECT TESTIMONY OF G. C. BAKER**

**(Revised December 10, 1993)**

**AND**

**SUPPLEMENTARY TESTIMONY OF G. C. BAKER**

PROVINCE OF NEWFOUNDLAND

BOARD OF COMMISSIONERS OF PUBLIC UTILITIES

IN THE MATTER OF:

An inquiry into issues relating to the supply of electricity to isolated rural areas of the Province.

DIRECT TESTIMONY OF G. C. BAKER

1 Q. Please state your name and address.

2 A. My name is George Chisholm Baker. I reside at Kentville, Nova  
3 Scotia.

4

5 Q. Please outline your qualifications and experience.

6 A. I am a registered professional engineer in Nova Scotia and  
7 have from time to time held licences to practice in other  
8 provinces and territories. I am self-employed as a consultant  
9 in matters relating to the regulation of electric utilities  
10 and have testified before this honourable Board on previous  
11 occasions. My experience relative to electric utilities  
12 covers about three decades and includes most aspects of  
13 utility operation. My clientele has included regulatory  
14 agencies in five Canadian jurisdictions, a number of utilities  
15 and departments of federal and provincial governments.

1 Q. What is your involvement in the present matter?

2 A. I have been engaged by the Board and have been directed to  
3 present opinions on any aspects of the present inquiry which  
4 lie within my knowledge and experience.

5 Q. Generally, on what aspects of the inquiry do you wish to  
6 testify?

7 A. My testimony relates to the following four topics:

8 1. Current Canadian electrical pricing practices relating to  
9 urban, rural and isolated customers;

10 2. Possible options to recover the cost of serving rural  
11 customers;

12 3. Price and non-price measures to limit electrical  
13 consumption in isolated rural areas; and

14 4. Possible rate structures for isolated rural customers.

15 Q. Are you basing your opinions on regulatory principles and  
16 practices?

17 A. Not entirely. There are two reasons; (1) regulatory  
18 practices tend to vary, and (2) as noted by several parties  
19 during the recent generic hearing on Hydro's cost of service,  
20 some aspects of the present inquiry lie outside the normal  
21 scope of regulatory principles.

1 For both reasons, it seems necessary to apply a broader  
2 criterion, and in my opinion the appropriate criterion is the  
3 economic welfare of society in general, and Newfoundland in  
4 particular.

5 Q. Please comment on current Canadian pricing practices relating  
6 to urban, rural and isolated customers.

7 A. The applicable regulatory principle is that rates should  
8 reflect costs. The cost of service criterion is widely  
9 supported, and was favoured by most of the parties involved in  
10 the Board's recent generic hearing. It is the basic criterion  
11 used by regulating agencies in Manitoba, New Brunswick, Nova  
12 Scotia and Prince Edward Island; the jurisdictions with which  
13 I am most familiar.

14 Nevertheless, the degree to which this principle is reflected  
15 in rates can, and does, vary from one jurisdiction to another  
16 depending on the structure of rate classes. For customers of  
17 the same type, it is generally cheapest to serve urban loads  
18 and more expensive to serve rural loads. If all the customers  
19 of one type (residential, for instance) are placed in the same  
20 class, urban customers subsidize rural customers, even though  
21 the rate charged may exactly recover the cost of serving the  
22 class as a whole.

23 It is in this respect that practice varies from one  
24 jurisdiction to another.

25 It is of course much more expensive to serve isolated loads.  
26 Therefore, if urban, rural and isolated customers of the same  
27 type were to be included in a single class, the degree of  
28 cross-subsidization would be considerably greater.

1 In both Manitoba and New Brunswick, residential rates are  
2 differentiated on the basis of customer density. Manitoba  
3 uses three density groupings; New Brunswick uses two. Fixed  
4 charge differentials reflect the differences in distribution  
5 cost between the relevant groups.

6 However, in its most recent rate application Manitoba Hydro  
7 stated, "Current rate zone distinctions are intended to  
8 reflect real differences in distribution cost. However, they  
9 are administratively complex, create difficulties for cost  
10 allocation and are not well understood by customers." The  
11 utility said that simplification possibilities were currently  
12 being examined.

13 By contrast, residential customers of the dominant utilities  
14 in PEI and Nova Scotia pay at the same rate wherever situated.  
15 Until recent years, Maritime Electric (MECL) rates in PEI  
16 differed for city, town and rural customers, but the regulator  
17 approved uniform rates as urged by the provincial government.  
18 Uniform rates were established in 1975 by Nova Scotia Power  
19 Corporation after it absorbed Nova Scotia Light and Power.

20 In the Maritime Provinces, and in Ontario as well, rate  
21 differentials are maintained in certain areas by virtue of the  
22 existence of distribution utilities. Such utilities buy part  
23 or all of their requirements at wholesale from the dominant  
24 utility and perform the distribution function; usually serving  
25 communities where customers are well concentrated. Their  
26 rates tend to reflect the inherently lower cost of service.

27 Winnipeg Hydro is the only such utility in Manitoba. Its  
28 rates are set at Manitoba Hydro levels, so in that case the  
29 City, not the electric customer, receives the benefit.



1 Distribution utilities are the norm rather than the exception  
2 in Ontario and their rates to customers have been regulated on  
3 a cost of service basis by Ontario Hydro. Distributing  
4 utilities in the Maritimes include Saint John and Edmundston  
5 in New Brunswick, seven municipal utilities in Nova Scotia and  
6 Summerside in PEI.

7 The existence of distribution utilities can generally be  
8 ascribed to historical circumstance. However, it may in part  
9 owe something to economic circumstance. In this connection,  
10 it is interesting to note that the Summerside utility, faced  
11 with having to pay a part of the cost of subsidizing rural  
12 customers of MECL, applied to the Commission for approval of  
13 plans to install enough diesel generation to replace its  
14 purchases from that utility. This matter has not yet been  
15 resolved.

16 Q. In your opinion, what causes the differences you have  
17 described?

18 A. There is an inherent conflict between Bonbright's desirable  
19 attributes of equity on the one hand and simplicity and  
20 understandability on the other. Judgment in any particular  
21 case is no doubt based on all the pertinent factors including  
22 the extent of the inequity, which is relatively small between  
23 urban and rural customers in these examples; and the weight  
24 accorded to customer understanding and acceptance. Judgment  
25 can be expected to vary from case to case.

26 Q. What is the situation regarding isolated areas?

27 A. There are none in the Maritimes. Manitoba Hydro has been  
28 providing service in thirteen communities isolated from its  
29 main grid. Customers in those communities can purchase

1 limited service at standard rural (Zone 3) rates. This  
2 collects about 30% of the cost of service.

3 For residential customers, limited service had been 15 amperes  
4 at 240 volts. However, in two communities the limit was  
5 increased to 60 amperes in 1991 and 1992.

6 General service (GS) customers received limited service (at  
7 Zone 3 rates) or full service (with basic monthly charge at  
8 Zone 3 level and energy rate recovering allocated cost). The  
9 rate varies by community and depends on whether or not the  
10 customer had made a capital contribution.

11 Government agencies, federal and provincial, are served under  
12 the GS full cost rate, but in addition pay a surcharge. The  
13 surcharge has been calculated so that the proceeds thereof,  
14 when added to the revenue from limited service customers,  
15 would bring the revenue/cost ratio on limited service up to  
16 the level of Zone 3 residential in the interconnected system.

17 In 1992, Manitoba Hydro adopted new objectives for its diesel  
18 zone. By 1997 it expected to have seven of the thirteen  
19 communities connected to the main grid. Concomitantly, it  
20 planned to increase the service restriction to 60 amperes in  
21 communities still served by diesel and to eliminate the rate  
22 distinction based on capital contribution. (All new customers  
23 have been paying a capital contribution for some years.)

24 These changes were expected to add to the costs borne by full  
25 service customers, both private and government.

1 Q. What conclusions, if any, do you draw?

2 A. I believe the Manitoba Hydro approach is instructive. In  
3 essence, it involves:

4 1. Full cost recovery from isolated areas, without burden on  
5 the interconnected system.

6 2. Subsidization of certain isolated system customers.

7 3. Limitation of service where subsidy exists.

8 4. Customer option to receive full service at full cost.

9 5. Recovery of revenue shortfall from federal and provincial  
10 government customers.

11 I conclude that some of these ideas merit consideration by the  
12 Board as a possible means of improving the status quo in this  
13 province.

14 Q. Do other jurisdictions supplying electric service to isolated  
15 areas use somewhat the same approach as Manitoba?

16 A. The approaches vary, but there are a few common threads.

17 There are four rate zones in the Yukon and fifty-three (one  
18 for each system) in the Northwest Territories. Rates recover  
19 costs in each zone.

20 Alberta Power says it does not apply a separate rate in remote  
21 areas, but does apply a surcharge as a reminder that service  
22 in those areas costs more. The surcharge approximately  
23 doubles the energy rate.

1 Ontario Hydro charges government customers 70 to 80 cents/KWh  
2 in isolated areas with air access only and 45 to 60 cents/KWh  
3 in isolated areas with road or rail access. Residential  
4 customers pay standard rates.

5 Quebec Hydro applies a 26 cents/KWh surcharge on all use over  
6 20 KWh per day for residential service north of the 53rd  
7 parallel.

8 In Saskatchewan, there is only one isolated system.  
9 Residential customers pay the same rates as applicable to  
10 rural and resort areas, plus a surcharge of about 6 cents/KWh  
11 on the first 650 KWh and about 20 cents/KWh on the balance of  
12 use. There is also a government surcharge.

13 The first common thread is that where high-cost isolated  
14 systems exist, every jurisdiction applies a surcharge or  
15 higher rate in the high cost areas. The higher rates recover  
16 all or nearly all the costs except in the case of Hydro  
17 Quebec, NLH, and perhaps in Alberta, where zone costs are not  
18 tracked. No jurisdiction simply applies universal rates,  
19 allowing the whole of the burden to fall on interconnected  
20 customers.

21 While limitations on service are applied in some jurisdic-  
22 tions, they are of a different nature than those applied in  
23 Manitoba. For example, Hydro Quebec applies a 1,000 KVA limit  
24 on individual loads and Alberta Power a 650 KW limit. Alberta  
25 Power also prohibits water heating or space heating loads.  
26 Elsewhere, restraint comes mainly from rate levels, not rules.

27 Again with the possible exception of Alberta Power, in no  
28 jurisdiction is the burden of service to isolated areas  
29 allowed to create a significant impact on the cost to  
30 interconnected customers except in Newfoundland and Labrador.

1 Q. Why is electric service provided in areas where it is so  
2 expensive that consumption needs to be subsidized?

3 A. The answer derives in part from the history of the electric  
4 utility industry in this country. The first electric service  
5 was provided by entrepreneurs who hoped to profit from the  
6 opportunities presented by growth of electrical technology.  
7 Areas served were at first rather random but soon came to  
8 include all major population centres and a number of smaller  
9 ones.

10 As electricity became more widely used and appliance  
11 availability made it more versatile and useful, governments  
12 concluded, as a matter of social policy, that electric service  
13 should be universally available, or as nearly so as possible.

14 The means of achieving that policy varied, but a common  
15 strategy was to provide grants to support the capital costs of  
16 rural electrification. Another was to create Crown electric  
17 utilities. Most of the Crown electrics were created expressly  
18 for this purpose.

19 Where rural electrification grants were provided, utility  
20 customers were left to bear the full cost of replacing the  
21 original equipment. Where cheap power sources were available,  
22 or load growth was sufficient, customers had no difficulty in  
23 meeting the subsequent full costs of service. This was the  
24 outcome in most cases.

25 Continuing subsidies were necessary only where social policy  
26 encouraged the provision of utility service in areas having  
27 adverse geographic and economic conditions.

1           So the answer to the question is clear and simple: subsidies  
2           are required because of social policies adopted by the  
3           governments concerned.

4           Q.    Would the need for continuing subsidies have been foreseen  
5           when such social policies were adopted?

6           A.    In the case of Newfoundland and Labrador, the record indicates  
7           that subsidies were envisaged from the outset, and paid in  
8           full from the consolidated revenue fund of the Province until  
9           1989.

10          Q.    Turning to the second area of your testimony, what options  
11          exist to recover the cost of serving rural customers?

12          A.    There are only three plausible options:

13                1. To recover all costs from the customers themselves.

14                2. To recover partially from customers, with the balance  
15                from the consolidated revenue fund.

16                3. To recover partially from customers, with the balance  
17                from other electric customers.

18          Q.    In the case of the second and third options, how much should  
19          be recovered from isolated customers?

20          A.    This is a matter of judgment. While it might be in part a  
21          matter for regulatory judgment, it certainly involves the  
22          question of social policy. As matters stand at present,  
23          judgment has been made by the government partially through the

1 provisions of the Electric Power Control Act and partially  
2 through its decision not to approve rate increases recommended  
3 by the Board in 1992.

4 However, the fact that this inquiry has been ordered, and the  
5 terms of reference thereof, support the inference that present  
6 policy is not cast in stone. I am basing my testimony on this  
7 assumption.

8 The portion of cost recoverable from customers is therefore  
9 regarded as a variable. Both the level of recovery from  
10 customers and the option selected have economic implications.  
11 From an economic perspective, the proportion recovered from  
12 customers should be as high as possible. Social and  
13 regulatory considerations could constrain the result to less  
14 than full recovery.

15 Q. Please explain the implications of economic theory.

16 A. It has been shown that in a free economy, pricing electricity  
17 at marginal cost results in optimum allocation of resources  
18 and maximizes the economic welfare of society.

19 This is a provable proposition under certain assumptions,  
20 which, however, are invalid or only partially valid in a real-  
21 life situation.

22 One assumption of the theory which does undoubtedly apply in  
23 real life is that price influences consumption. The  
24 relationship is inverse: that is to say, consumption goes  
25 down as the price paid goes up. Economists call this  
26 relationship the price elasticity of demand and measure it as  
27 the ratio of change in use resulting from a small change in  
28 price.

1 Price elasticity is affected by the time duration of the price  
2 signal. It takes years to reach its maximum. Exhibit 1 shows  
3 the relationship between price and use for the three Maritime  
4 Provinces. Although more than price may be involved, the  
5 comparison suggests that long-term elasticity is substantial.

6 Thus the price signal is important, whether or not marginal  
7 cost theory is applicable. If the theory is applicable, then  
8 marginal cost gives the correct price signal; if it is not,  
9 then allocated cost will be more or less appropriate.

10 From the economist's viewpoint, if a customer pays only 30% or  
11 40% of the cost, then the signal received is drastically out  
12 of step with reality. Full cost would give the correct  
13 signal, and failing that, the price should be as close to cost  
14 as possible.

15 If subsidy costs are charged to other electric users, they too  
16 will receive wrong price signals. But in their case the  
17 signal will be too high and result in consumption below that  
18 level which would maximize the economic welfare of the  
19 Province.

20 From the standpoint of economic efficiency, the best approach  
21 would involve government payment of a subsidy, maintained at  
22 the least possible level consistent with social and regulatory  
23 considerations.

24 Q. That argument is based on theory. Would practical results  
25 agree with theoretical predictions?

26 A. If there were any differences, they would be merely  
27 differences of degree.



1 Customers in isolated areas, with relatively few options,  
2 might exhibit a relatively small elasticity of demand.  
3 However, higher prices would encourage DSM penetration and the  
4 resulting increases in efficiency would tend to offset both  
5 the small elasticity and the added cost due to higher prices.

6 For customers in the interconnected system, the effects could  
7 be much greater than might be inferred from the roughly 10%  
8 increase in cost incurred to pay the subsidy. For instance,  
9 in the case of an industry dependent on export markets, the  
10 10% could well make the difference between continued existence  
11 and collapse. Such export markets are highly competitive and  
12 foreign buyers are unlikely to make voluntary contributions to  
13 support electric customers in the isolated areas of  
14 Newfoundland and Labrador.

15 If the burden of subsidy is placed on the interconnected  
16 systems, not every customer would be affected to the extent  
17 envisaged in the foregoing example, but every industrial and  
18 business customer would to some small extent be rendered less  
19 competitive: less able to maintain market share against  
20 outside competitors in both internal and external markets.

21 Q. Why wouldn't paying the subsidy out of tax revenue do the same  
22 thing?

23 A. It would, but to a lesser degree. Taxation correlates at  
24 least to some extent with ability to pay and is presumably  
25 designed to raise the required revenue with least economic  
26 damage. The intensity of electric use correlates with type of  
27 industry, not ability to pay.

28 There is one other difference. Failure to reflect economic  
29 cost in prices can, and in the case of utility and municipal

1 services does, lead to locational inefficiencies. Taxation  
2 does not in general have this effect.

3 Q. Have you anything to add regarding options?

4 A. Yes. My testimony on this point tends to emphasize the  
5 conflict between the dictates of economic theory and social  
6 considerations. Also, it has focussed narrowly on electric  
7 energy. A broader view may lead to an expedient which is to  
8 some extent capable of achieving the best of both worlds.

9 Available information on costs of other commodities tends to  
10 support the view that electricity is not the only item which  
11 is more expensive in the isolated areas.

12 For example, a 1984 report<sup>1</sup> shows that food prices were  
13 higher in remote and isolated areas, being highest in small  
14 coastal Labrador communities. Choice was more limited in  
15 these areas as well.

16 The Committee concluded that:

17 ". . . the factors which are most important in  
18 influencing differences in food prices across  
19 communities in Newfoundland and Labrador are the  
20 distance of those communities from larger  
21 population centres, the size of food stores serving  
22 the consumers of those communities, and the variety  
23 of food items available in those stores."

---

24 <sup>1</sup>Report of the Select Committee of the House of Assembly on  
25 Food Prices, submitted November 9, 1984 to the House of Assembly.

1 Price differentials were also evident for fuel in a 1991  
2 report<sup>2</sup>. For example, diesel fuel cost 18% more in the  
3 Northern Peninsula, ranging up to 40% more in coastal  
4 Labrador, compared to larger centres in the Avalon Peninsula.  
5 Price differences for stove oil were less in some areas but  
6 amounted to as much as 37% higher in some coastal Labrador  
7 communities.

8 Although not documented, there are grounds for belief that  
9 most other commodity prices would be similarly affected by  
10 transportation and storage costs, low volume and consequently  
11 high overheads.

12 Based on inquiry, it appears that no subsidy is applied to  
13 reduce the price of any of these commodities in isolated  
14 areas. Yet for residents of such areas the ability to pay for  
15 electricity is the difference between income and the cost of  
16 everything else which must be purchased.

17 Why subsidize electricity and not heating oil? Why pick on  
18 one item? If it is accepted that humanitarian, social,  
19 jurisdictional, economic or any other grounds justify the  
20 maintenance of populations in remote locations, and some such  
21 reasons do surely exist, then a general subsidy would appear  
22 to be more appropriate.

23 These considerations suggest that the best solution to the  
24 subsidy problem may well be to pay residents a stipend from  
25 the consolidated revenue fund for living in such areas and to  
26 charge full cost for electricity, like all other commodities  
27 and services.

---

28 <sup>2</sup>Cost of Fuel and Utilities, Newfoundland & Labrador, 1991;  
29 prepared by Department of Mines & Energy and Newfoundland  
30 Statistics Agency Executive Council.

1 Consumers would "see" costs in true proportion and would then  
2 be able to make intelligent purchasing decisions. Conflict  
3 between the dictates of economic theory and social necessity  
4 would vanish.

5 The amount of the payment could still be determined as the  
6 difference between cost of electric service to isolated areas  
7 and the revenue which would accrue therefrom at subsidized  
8 rates. The essential feature would be the decoupling of  
9 subsidy and electricity consumption.

10 Such an approach is not without regulatory precedent. It is  
11 one of the four major methods set out in the 1992 edition of  
12 the NARUC Cost Allocation Manual for the reconciliation of  
13 marginal cost rates with the utility revenue requirement.<sup>3</sup>  
14 Subject to some modifications suggested by marginal cost  
15 considerations and outlined in my supplementary testimony, I  
16 recommend this approach for consideration by the Board.

17 Q. Would you advocate the same approach in the case of non-  
18 residential loads?

19 A. If there is a need and justification for subsidization, then  
20 in my opinion the same approach should be used.

21 Q. What about rural customers in the Island Interconnected  
22 System?

23 A. The same treatment would be appropriate, with the exception  
24 that the size of the payment, or stipend, would reflect the  
25 higher level of cost recovery and would be proportionately  
26 smaller.

---

27 <sup>3</sup>Electric Utility Cost Allocation Manual, 1992; National  
28 Association of Regulatory Utility Commissioners; p. 149 and p. 162.

1 Q. If this approach were deemed inappropriate, what other options  
2 do you suggest?

3 A. Variations of the suggested method are possible. If  
4 responsibility for the subsidy were not removed from the  
5 shoulders of interconnected customers, Hydro could still set  
6 isolated area rates at cost and provide relief in the form of  
7 a credit or flat discount.

8 In either case, a proper price signal would be received by  
9 isolated customers. However, in the second case, with  
10 responsibility for payment remaining with interconnected  
11 customers, these customers would receive a false signal.

12 Q. The third topic you mentioned is the limitation of electric  
13 power and energy used in isolated rural areas. What are your  
14 views?

15 A. This is the final item in the terms of reference for the  
16 inquiry as approved by the Lieutenant-Governor in Council.

17 The proper objective in this context is to minimize the amount  
18 of the necessary subsidy. Whether reducing consumption will  
19 have this effect may seem self-evident but it is not  
20 necessarily true.

21 It is in my opinion important that this phase of the inquiry  
22 be based on a quantitative understanding of the relationship  
23 between consumption and revenue shortfall. Otherwise, the  
24 remedies proposed may be ineffective or completely counter-  
25 productive.

1 Q. How can the effect of changes in use be analyzed?

2 A. On the conceptual level, costs go up as loads increase. For  
3 an increase in output which does not exceed system capacity,  
4 there is an increase in fuel costs and perhaps to a minor  
5 extent an increase in the variable portion of maintenance  
6 costs. No new plant has to be built to supply the increased  
7 load, so fixed costs remain unchanged. The incremental costs  
8 under these circumstances are conveniently measured as the  
9 ratio of the total increase to the total change in output.  
10 This ratio is termed the short-run incremental cost.

11 If the increment is very small (one KWh in practice) the cost  
12 ratio is defined as the short-run marginal cost. Short-run  
13 marginal cost varies with the state of the system, so marginal  
14 and incremental costs are not necessarily the same. However,  
15 the difference is usually small and the terms are often used  
16 interchangeably. In isolated systems with diesel generation  
17 and three or more prime movers, marginal and incremental cost  
18 would be almost synonymous.

19 If the load increment is large enough to exceed existing  
20 capacity, or to affect reliability adversely, then fixed costs  
21 as well as variable costs can be expected to change. The  
22 incremental and marginal costs, calculated as described above,  
23 are in this case termed long-run costs.

24 The effect of changes in customer usage can be calculated for  
25 the isolated systems by comparison of the change in  
26 incremental cost with the change in rate revenue. For  
27 example, assume the short-run marginal cost is 9 cents/KWh and  
28 the rate at which the last KWh is purchased is 12 cents/KWh.  
29 Then decreasing consumption by one KWh would decrease Hydro's  
30 costs by 9 cents and its revenue by 12 cents, increasing the

1 revenue deficiency and the necessary subsidy by 3 cents in the  
2 short term.

3 Long-run incremental cost is normally stated in dollars per  
4 kilowatt, but can be converted to a cents per KWh equivalent.  
5 Assume in the foregoing example that long-run marginal cost is  
6 14 cents/KWh. Then in the long term, the reduction in use  
7 would yield a 2-cent reduction of subsidy rather than a 3-cent  
8 increase.

9 This example makes it obvious that the effects of reduced  
10 consumption can be expected to differ with time. Short-run  
11 results would continue until system capacity is fully  
12 utilized. So the present amount of surplus capacity in the  
13 isolated systems is a factor.

14 Marginal costs differ from one isolated system to another. If  
15 all the systems are grouped, which may be necessary from the  
16 standpoint of practicality and rate uniformity, an optimal  
17 strategy for the whole group would be considerably less  
18 beneficial than an optimal strategy for each isolated system  
19 individually.

20 The rate at which marginal energy is purchased varies from  
21 customer to customer. Thus a precise system-by-system  
22 calculation would require billing frequency data segregated by  
23 system.

24 While a precise analysis is certainly possible, it would  
25 require a major data-gathering and analytical effort. It  
26 appears that an overall view represents the limit of  
27 practicality at this time.

1 Q. Have you made any estimates of that nature?

2 A. Not as yet. Some helpful data being prepared in response to  
3 demands for particulars was not available at the time of  
4 preparation of this evidence.

5 Q. Assuming that decreasing consumption in the isolated systems  
6 would in fact reduce the subsidy, what price or non-price  
7 measures could Hydro employ to limit demand and energy use in  
8 isolated rural areas?

9 A. The most effective price measure would be to charge cost-based  
10 rates. This would be feasible if subsidy and rates were  
11 decoupled as suggested above. It would be difficult to  
12 achieve any significant modification of usage by tinkering  
13 with heavily-subsidized rates.

14 Non-price measures comprise two categories, demand side  
15 management (DSM) and arbitrary limitations.

16 Q. Would DSM be useful?

17 A. DSM is a flexible and equitable tool. It stands in great  
18 favour with regulators, who may have been oversold on its  
19 potential.

20 Some months ago, I reviewed extensive data compiled by EPRI  
21 and found that savings by US utilities up to 1990 had amounted  
22 to 1.3% of energy use and 3% of summer peak demand. DSM  
23 expenditures had been in excess of \$25 billions. In simple  
24 terms, the purchase of gas turbines of equivalent capacity and  
25 the associated energy would have cost about the same as the  
26 DSM programs. Projected savings by the end of the century are



1 3% for energy and 6.7% for peak demand. It appears that in  
2 fact, results have been quite modest.

3 The cost of implementing DSM programs, particularly the  
4 incentives offered, depends greatly on the cost of electricity  
5 to the customer. So does the penetration achieved. It is  
6 easier, and cheaper, to convince customers of the benefits of  
7 efficiency if the customer sees the possibility of significant  
8 savings.

9 For many utilities with access to cheap hydro, coal or gas  
10 resources, electricity rates remain modest, and this is  
11 probably the reason DSM results have been relatively  
12 unimpressive.

13 One could hope and rationally expect that much greater  
14 penetration could be achieved in the isolated areas. On the  
15 other hand, customer dispersion and remoteness would make it  
16 harder to design and carry out effective programs.

17 On balance, I consider the isolated areas an attractive target  
18 for DSM efforts.

19 Q. Do you have any suggestions about the approach Hydro should  
20 take to DSM?

21 A. Yes, there are two.

22 The term DSM is usually applied to measures intended to reduce  
23 consumption through enhancing the efficiency of end use  
24 appliances, equipment, and systems. By contrast, many  
25 utilities use it for building desirable loads, shedding  
26 undesirable loads, reshaping load curves and other similar  
27 measures offering cost reduction, improved reliability or  
28 profit.

1 The first suggestion is that Hydro should use the latter or  
2 broader definition of DSM. From the response to GCB-2, it  
3 appears that load factors in the isolated system now range  
4 from about 59% at Nain to a low of 19% at Norman Bay, with an  
5 average of about 38%. This indicates unusually low  
6 utilization of the investment in generating plant. I do not  
7 for one moment suggest this is the result of poor planning.  
8 The situation is no doubt due to small size and number of  
9 prime movers and flows from the application of proper system  
10 planning procedures. Under the circumstances, DSM programs  
11 aimed at reshaping the load curve might well have some cost-  
12 saving potential.

13 Secondly, while the well-known California tests are useful for  
14 sifting DSM possibilities, I am firmly convinced that they do  
15 not provide a satisfactory criterion for the size and content  
16 of the overall DSM effort. In my opinion, DSM should be part  
17 of least-cost planning. The overall DSM package should be  
18 such that it minimizes the present worth of subsidy required  
19 through the planning period. The suggested criterion is  
20 strictly in line with Hydro's objective to minimize the degree  
21 of cross-subsidization required. The California tests are  
22 not. They can be, and have been, applied in such a way as to  
23 increase the utility's cost of service.

24 Q. Please outline your views on service limitation.

25 A. Service limitation may take a number of forms. Manitoba Hydro  
26 limits service entrance capacity, as already noted. another  
27 form of limitation is a ban on certain end uses, such as  
28 electric heat.

29 Such limitations are effective in reducing load, or preventing  
30 load growth. They have the disadvantage of being arbitrary.

1 Customers are deprived of choice. In this respect, the option  
2 offered by Manitoba Hydro (accept the limitation and subsidy  
3 or pay full cost) appears preferable. Hydro cites  
4 disadvantages of scale as one of the underlying reasons for  
5 high cost in isolated areas. Service limitations would tend  
6 to maximize this particular disadvantage, although there might  
7 be compensating benefits to the system.

8 Between the alternatives, I tend to favour cost-based rates  
9 plus well designed, well timed and well executed DSM programs  
10 as the best approach from all points of view.

11 Q. What are your comments on rate structure for rural customers?

12 A. The task set for the inquiry under the terms of reference is  
13 to investigate (and presumably identify) "an appropriate rate  
14 structure, with reasons for preferring it to the other  
15 identified options".

16 This might be construed to require the recommendation of  
17 actual rates for application in the isolated areas. For two  
18 reasons it appears that what might reasonably be expected to  
19 result from the inquiry is a general specification of the rate  
20 types and forms deemed to be most appropriate.

21 The design of actual rates requires access to large quantities  
22 of billing and other data, suitable computational facilities,  
23 painstaking work and extensive testing of results. It is an  
24 activity usually best left to the utility.

25 Moreover, changes of rate structure usually result in changes  
26 of impact as between customer and customer. To preserve some  
27 degree of stability and avoid rate shock, it is usually found  
28 necessary to make the changes in small steps over a period of

1 time. For any really significant changes, several sets of  
2 rates over several years would probably be required.

3 Accordingly, my comments will relate only to rate principles,  
4 class structure, rate types and forms.

5 Q. What principles should apply?

6 A. The desirable attributes set out by Bonbright<sup>4</sup> have for many  
7 years been the regulatory norm, on this continent at least.  
8 The major requirements are that rates be accurate in raising  
9 the revenue requirement, conducive to efficient use of  
10 electricity and equitable as between both customer classes and  
11 individuals within each class. The attributes are set out  
12 verbatim in Appendix 1 of this testimony.

13 There is in my view nothing to be gained and much to be lost  
14 by departing from these principles in the case of isolated  
15 area rates. The high cost of service in these areas makes  
16 both equitable sharing of the load and efficient use even more  
17 important than is usually the case.

18 Q. How can these attributes best be realized?

19 A. Mainly by ensuring that rates reflect responsibility for cost  
20 causation.

21 Unfortunately, this answer, although simple and correct, is  
22 open to two interpretations, depending on how "cost" is  
23 defined. Most economists might define it as marginal cost.

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24 <sup>4</sup>Bonbright, Principles of Public Utility Rates, 1961;  
25 Bonbright et al., 1988.

1 From the standpoint of the utility, cost is the embedded cost  
2 of service.

3 If the marginal cost definition is adopted, then marginal cost  
4 rates would be applied. For a system optimally designed for  
5 the characteristics of the load it supplies, such rates would  
6 in theory meet the revenue requirement and conduce to economic  
7 efficiency through an appropriate allocation of productive  
8 resources.

9 Real-life utility systems are never optimal for a number of  
10 reasons and the application of marginal cost rates does not in  
11 general yield the revenue requirement. Also, the conditions  
12 under which marginal cost rates would maximize the social  
13 welfare are not realized in practice.

14 Marginal cost rates are often used when load growth would  
15 necessitate large additional investment in plant. Under these  
16 circumstances, long-run marginal cost signals to customers the  
17 consequences of continued growth.

18 In the isolated systems, generation expansion entails adding  
19 a few small diesel units every few years and there is no  
20 likelihood of a sudden large increase in the cost of service.  
21 A different and somewhat unusual circumstance, which renders  
22 long-run marginal cost relevant in the Isolated Systems, will  
23 be discussed in my supplementary testimony.

24 Short-run marginal cost tracks fluctuations from hour to hour.  
25 Therefore, unless time-of-use rates were to be used, with  
26 consequent large expenditure for metering equipment, short-run  
27 marginal cost would be completely irrelevant. Variable cost  
28 is more applicable to the Isolated Systems.

1 Marginal cost might well be used as a floor level for all  
2 rates. In that case, one could be confident that the deficit  
3 (in constant dollars) would not increase with load growth.

4 Q. How should rate classes be structured?

5 A. In order to avoid the sort of cross-subsidization discussed in  
6 the first part of this testimony, each rate class should be as  
7 nearly as possible homogeneous in terms of unit costs of  
8 service. This means that the cost-causative characteristics  
9 of electric use should be similar and that the class should be  
10 served from the same source of supply.

11 These requirements result in the segregation of domestic  
12 customers in one class and tend to encourage dividing the  
13 remainder of customers according to use characteristics and  
14 voltage level at which service is provided. The latter is  
15 usually determined by the size of load, so large customers are  
16 separated from small customers.

17 Basing class structure on end use (that is, having separate  
18 classes for the tinker, tailor and candlestick maker) is now  
19 frowned upon, but separation based on end use is correct and  
20 logical if there is a real difference in the relevant  
21 characteristics of electric use.

22 For example, the operator of an electric arc furnace taking  
23 large power for a short time and a retail establishment with  
24 a load likely to be on the system constantly through business  
25 hours would not put the same portion of their demands on the  
26 system peak and would not bear the same cost responsibility  
27 per kilowatt of metered demand. It would be hard to serve  
28 them equitably under the same rate.

1 These considerations often lead to segregation into general  
2 service and industrial categories, which may be further  
3 segregated by voltage level into secondary, primary and  
4 transmission customers.

5 Often rate "riders" are used to modify a rate in certain cases  
6 and to keep the number of classes from expanding beyond  
7 reason. For example, industrial customers at various voltage  
8 levels may form one class under a rate which has a rider to  
9 adjust for the difference in the cost of line losses. In such  
10 a case the class is one class for cost of service purposes and  
11 the operation of the rider ensures an equitable division of  
12 allocated cost between the sub-groups.

13 Hydro's isolated area cost of service study shows eight  
14 classes: one domestic, one school and church, one special,  
15 four general service and one street lighting. Apparently  
16 Hydro offers only one general service rate (GS Diesel). The  
17 other rates in the COS study are to track discounted rates  
18 required by order-in-council for a few customers.

19 The rates established by order-in-council now constitute  
20 largesse distributed by the government at the cost of electric  
21 customers generally; a somewhat disturbing situation which may  
22 well have arisen by inadvertence when the government decided  
23 to withdraw its subsidy.

24 The Board should ask for a government review of the orders in  
25 council, and should recommend that if the discounts are still  
26 considered appropriate they should be effected by government  
27 subsidy with Hydro's standard rates being charged to all  
28 customers.

1 Q. Isn't there some possibility that some customers will not fit  
2 well in any given class structure of reasonable simplicity?

3 A. Yes, there is.

4 Most utilities have a real concern for their customers, and  
5 when this happens, the utility usually will, and should, try  
6 to find some method of eliminating the problem.

7 This can sometimes be accomplished by means of a rate rider,  
8 or sometimes may justify some modification of class  
9 structure.

10 If the customer's costs are inordinately high due to unusual  
11 circumstances, the utility may be able to get the customer to  
12 alter its use characteristics in a way which benefits the  
13 utility and justifies a corresponding reduction of rate.

14 The constraints are that such adjustments should not adversely  
15 affect other customers, and that the same treatment should be  
16 available to all customers in substantially similar  
17 circumstances. That is, the solution must be non-  
18 discriminatory.

19 Q. Is the same type of rate suitable for all classes?

20 A. Not in general.

21 The primary question is whether rates are to be based on  
22 energy use only or on both energy use and customer peak  
23 demand.

24 Demand metering is considerably more expensive than energy  
25 metering, in terms of both first cost and maintenance cost.  
26 The latter is inflated, unreasonably in my view, by the



1 requirements of the Electricity and Gas Inspection Branch.  
2 For the domestic class, which normally constitutes an  
3 overwhelming proportion of total customers, demand metering  
4 would be very expensive and, since the demands tend to fall in  
5 a narrow bracket, demand metering would add little if anything  
6 to the accuracy of cost recovery.

7 For these reasons, it is normal to apply energy-only rates to  
8 the domestic class.

9 Much the same arguments apply in the case of small commercial  
10 loads and in some cases small industrial loads as well.

11 However, for large loads, demand metering is the norm.

12 Insofar as the isolated systems are concerned, energy-only  
13 metering is certainly most appropriate for the domestic class  
14 and General Service customers with small demands. However, it  
15 is noted that a few GS customers account for a significant  
16 portion of demand in the systems serving them (NP-4). For  
17 these customers and perhaps some other of the larger  
18 customers, a demand-based rate appears likely to be more  
19 suitable.

20 Usually in the case of energy-only rates, and less frequently  
21 where a demand charge is applied, there is also a flat charge  
22 per month or billing period to recover distribution customer  
23 costs. Hydro includes a customer charge in both its domestic  
24 and GS rates.

1 Q. What are your views on the form of Hydro's isolated area  
2 rates?

3 A. The main options in energy-only rates are blocked or flat  
4 rates and if blocked, whether the prices ascend from block to  
5 block (inverted block rates) or descend (declining block  
6 rates).

7 The main question in the design of cost-based rates is which  
8 of these rate forms best correlates with cost over the whole  
9 range of use. The answer depends on the relative coincident  
10 loads of small, medium and large domestic users. It emerges  
11 from load research.

12 Hydro's domestic rate is of the inverted block type: 700 KWh  
13 at 6.541 cents, 300 KWh at 9.606 cents, and all additional at  
14 13.022 cents.

15 Inverted block rates flow from the "lifeline" idea. The  
16 customer gets what he ought to be able to get along with at  
17 minimum cost. If he uses more, it signifies waste or  
18 carelessness, which receives the treatment it deserves.

19 The implicit assumption behind this approach is that all  
20 customers are alike: cast like little tin soldiers from the  
21 planners' mold. In fact they are not, nor do variations of  
22 use necessarily arise from economy or waste. Ontario Hydro  
23 research some years ago determined that domestic usage  
24 correlated most strongly with the number of persons in the  
25 household. In the years since, electric heat has moved into  
26 first place in many utilities and number of persons comes  
27 second.

1 Lifeline rates are seldom cost-based, and when they are not,  
2 involve significant subsidization of small users by large  
3 users.

4 In the isolated systems, there must be at least a few where  
5 oil supplies are not dependable and wood supplies are  
6 inadequate. Something like this would be necessary to account  
7 for the existence of electric heating loads, even with the  
8 high run-off rate. Is it equitable to penalize electric heat  
9 if there is no alternative? Is it equitable to force large  
10 householders to subsidize small householders?

11 The GS Diesel rate is also an energy rate of the inverted  
12 block type. In this case, and in the absence of demand  
13 metering and demand-blocked rates, the inevitable consequence  
14 is that large customers subsidize small. (Unless, of course,  
15 the large customers get discounted rates by order-in-council).

16 The existing rates obviously owe much to historical  
17 circumstance and the foregoing criticisms are not directed at  
18 Hydro. The target is the status quo.

19 In my opinion, the present domestic rate should be replaced by  
20 a cost-based rate. The GS rate should be replaced by a cost-  
21 based energy rate for most users, and a demand-blocked rate  
22 for the largest users.

23 Q. Does that conclude your testimony?

24 A. Yes, at this time.

SUPPLEMENTARY TESTIMONY

OF G. C. BAKER

1 Q. What is the purpose of your supplementary testimony?

2 A. The main purpose is to present estimates of the effects on  
3 Hydro's revenue, cost and deficit of changes in Isolated  
4 System demand and energy requirements. There is some  
5 difference between short-run and long-run effects, and  
6 estimates of both have been made.

7 Q. How would the deficit Hydro incurs in operating the Isolated  
8 Systems be affected by changes in energy use?

9 A. As a basis for calculating these effects, a very simple  
10 equation is available: the change in deficit equals the  
11 change in cost less the change in revenue.

12 The per-unit change in cost due to change in energy use is  
13 calculated in Exhibit 2, page 1, for individual systems and  
14 for the Isolated Systems as a group. The figure is 8.38¢ per  
15 KWh for all Isolated Systems combined or 9.25¢ per KWh,  
16 excluding Roddickton/St. Anthony. These costs are not short-  
17 run marginal costs in the strict sense of the word. They  
18 represent short-run marginal cost averaged over a full year.  
19 However, to ensure that they do not become confused with  
20 fully-allocated energy costs they are referred to as marginal  
21 costs in this testimony.

22 If energy use were to decrease by say 1% in every isolated  
23 system, the decrease in Hydro's cost would be 919,750 KWh  
24 multiplied by marginal cost per KWh (8.38¢), resulting in a  
25 total decrease of \$77,075.

1 The exhibit shows that short-run marginal cost varies  
2 considerably from one system to another, ranging from a low of  
3 less than 7¢ per KWh at Ramea to 28¢ per KWh at Norman Bay.  
4 Obviously, if the reduction in energy use does not occur  
5 proportionately in all systems, it would be necessary to make  
6 a detailed calculation on a system-by-system basis.

7 The data necessary to calculate changes in revenue is shown in  
8 Exhibit 2, pages 2 and 3. For small changes as assumed in  
9 this example, a close estimate can be made by considering the  
10 proportion of customer bills falling in each block. The loss  
11 of revenue per KWh for this case is calculated in Exhibit 2,  
12 page 4.

13 Assuming the 1% decrease to be made entirely by Domestic  
14 customers, the revenue loss would be 919,750 KWh multiplied by  
15 \$.086577, or \$79,629 in total. The net effect of the 1%  
16 decrease in sales would be to increase Hydro's deficit by  
17 \$2,554.

18 In cases involving large reductions, or uneven distribution  
19 thereof, a different method of estimating revenue loss, based  
20 on separate calculation for each bill size interval, would be  
21 required.

22 It is emphasized that the results are highly dependent on the  
23 distribution of the reduction (or increase) between both  
24 isolated systems and customer classes. General service  
25 customers have higher energy rates than Domestic customers and  
26 purchase a larger proportion of their energy at tail block  
27 rates.

1 Q. Your example shows an increase in the deficit. Would that  
2 hold true for any reduction in energy use?

3 A. Results would be somewhat more favourable if the reductions in  
4 use could be made selectively in the Isolated Systems with  
5 higher marginal cost. Exhibit 2, page 4, item 3, shows the  
6 marginal cost for the 23 highest cost systems, in which total  
7 energy use is 20,991 MWh per year.

8 Two further examples may help to outline the potential for  
9 deficit reduction. First, assuming a 20% reduction in sales,  
10 randomly spread over all Domestic customers excluding those in  
11 Roddickton/St. Anthony, the result would be a deficit increase  
12 of about \$24,000.

13 Secondly, assuming the same conditions, except that the  
14 reductions are secured from the 23 highest cost systems, the  
15 result would be a deficit reduction of about \$170,000.

16 In my opinion, the conditions specified in the second example  
17 go well beyond the limits of rational expectation. It  
18 therefore appears that:

19 1. While some slight potential for deficit reduction through  
20 reduced energy use may exist under Hydro's present rates,  
21 it is insignificant in comparison to the size of the  
22 deficit; and

23 2. If rate increases from time to time exceeded  
24 contemporary increases in fuel costs, any possible  
25 potential for deficit reduction by this means would cease  
26 to exist.

1 Q. What is the situation regarding long-run costs?

2 A. Based on data supplied by Hydro, I have made an estimate of  
3 long-run marginal cost of generation in the Isolated Systems.  
4 Because rates in these systems are based on energy only, the  
5 estimate has been expressed on a per-KWh base. For the  
6 Isolated systems overall, the figure is 1.45 cents per KWh.  
7 For the Isolated Systems excluding Roddickton/St. Anthony, it  
8 is 2.12 cents per KWh. The assumptions and methods used in  
9 estimating are outlined in Appendix 2. Calculations and  
10 results are shown in Exhibit 3.

11 The figures given combine both the marginal cost of capacity  
12 and a correction for the long-run marginal cost of energy,  
13 which is below short-run cost because some of the future units  
14 will be larger and more efficient than existing units. The  
15 overall marginal cost of capacity is 1.57 cents before netting  
16 off the energy savings.

17 Q. What is the significance of these figures for present and  
18 future costs in the Isolated Systems?

19 A. They have absolutely no significance for present costs but  
20 considerable significance for future costs.

21 In 1992, the test year for purposes of this inquiry, all the  
22 fixed costs which must be met by rate revenue or subsidy are  
23 embedded costs. The 1.45 cents is the present worth, in 1992  
24 dollars, of future fixed costs which will be incurred by an  
25 extra KWh of energy use in 1992 at average system load factor  
26 and is assumed to be used each year thereafter in perpetuity.

1 Q. Then will system costs be raised in future if loads increase?

2 A. Yes. Total future costs will increase, because the cost of  
3 owning and operating plant to meet the increased load will be  
4 added to the costs associated with meeting existing loads.

5 However, sales and revenue would also increase due to the new  
6 load, and one cannot simply assume that unit costs would  
7 increase. That is so for most utilities today, but it is not  
8 necessarily so; and it is definitely not so in the case of the  
9 Isolated Systems.

10 Using the same assumptions as for long run marginal cost, the  
11 cost of replacing present plant is calculated in Exhibit 4.  
12 The answer, which may be regarded as the long-run marginal  
13 cost of continuing to use the present energy requirement, is  
14 2.59 cents per KWh as calculated for 1992. However, the  
15 present population of generating units is not evenly spaced in  
16 terms of in-service date and the stated cost, as computed for  
17 1992, may be slightly distorted on this account. Calculations  
18 made at 5-year intervals up to 2012 A.D. have a geometric mean  
19 of 2.70 cents per KWh, which is probably a more representative  
20 figure.

21 It follows that additional load would reduce the unit cost of  
22 service in future.

23 Q. How accurate are your estimates of long-run marginal cost?

24 A. They are based on a large number of assumptions, and certainly  
25 contain error. However, the assumptions used in the  
26 calculation of marginal cost and replacement cost are uniform,  
27 so that substantially the same error will be present in both



1 estimates. The conclusion that growth would reduce future  
2 unit costs therefore appears to be reliable.

3 Q. Why would long-run marginal cost be lower than average  
4 embedded cost for the Isolated Systems and higher for most  
5 other utilities?

6 A. Two factors go a long way toward explaining this difference.

7 In GCB-1, Hydro attributed the high cost of the Isolated  
8 Systems in part to disadvantages of scale. The comments under  
9 (b), first two sentences, and (c), last sentence, are  
10 particularly relevant. Growth tends in some small degree to  
11 lessen these disadvantages and therefore to lower costs. Most  
12 other utilities do not suffer from disadvantages of scale.

13 The second factor relates to the type of generation  
14 contemplated for future installation. Most utilities plan on  
15 meeting load increases with at least a proportion of base-load  
16 thermal generation. Environmental requirements have raised  
17 the cost of base-load generation proportionately more than the  
18 cost of diesel generator units, so long-run marginal cost  
19 tends to be higher for such utilities.

20 Q. As a result of your examination of marginal costs, do you  
21 consider that growth offers a better path to deficit reduction  
22 than shrinkage?

23 A. Within limits, yes. One must not overlook the fact that  
24 higher sales would require a higher outlay by customers. The  
25 extent to which customers in Hydro's Isolated Systems would be  
26 able to increase their purchases and the extent to which they  
27 would find such increases beneficial is probably very limited.

1 From an ethical point of view, Hydro should encourage  
2 efficiency in the end use of electricity but in view of the  
3 fact that LRMC is below embedded cost, I do not consider it  
4 appropriate to pursue demand management initiatives simply for  
5 the purpose of decreasing sales.

6 The best strategy in my opinion would be to charge cost-based  
7 rates and leave it to customers to decide how much electricity  
8 they should buy.

9 Q. Wouldn't cost-based rates inhibit demand?

10 A. Yes, to an extent depending on both rate level and rate  
11 design. The present inverted block rates are inhibitory and  
12 increasing their level would certainly discourage consumption,  
13 particularly in the second and third blocks where the rates  
14 are already at or above marginal cost and more sales would  
15 improve Hydro's cost recovery.

16 The fact is that most of the costs of service are fixed. To  
17 a greater extent than at present, fixed costs could (and  
18 should) be recovered through fixed charges, leaving energy  
19 rates somewhat above marginal cost and with a declining block  
20 structure.

21

22 Q. Have you examined the effect of such rates?

23 A. Yes. The rate used for this purpose was based on the  
24 assumption that the subsidy remains at the present level and  
25 is used by Hydro to reduce the fixed costs recoverable from  
26 customers. The remaining classified costs plus long-run  
27 marginal cost were then used to determine the rate elements.

1 Derivation of the rate, and its yield in comparison to present  
2 rates, are outlined in Exhibit 5, page 1. The comparison is  
3 made for Domestic and General Service Diesel classes only.  
4 Rates, usage and rate yield of the other classes are assumed  
5 to remain unchanged.

6 In essence, the test rate collects all customer costs through  
7 the service charge, collects marginal energy cost plus  
8 distribution demand cost in the first energy block and both  
9 long- and short-run costs in the second block. The Domestic  
10 third block rate is the same as the second block rate. In  
11 effect, there are only two blocks.

12 Changes in use expected as a result of changed rate levels are  
13 estimated using an assumed elasticity of  $-0.1$ , which may be  
14 high for first-block use, but is in the general range of  
15 investigative results elsewhere. The details are shown at  
16 Exhibit 5, page 2.

17 Q. What are the end results?

18 A. Revenue is projected to increase by about 6.8% as a result of  
19 the generally higher rates and sales are also projected to  
20 increase marginally; from 78.2 GWh to 78.6 GWh for the two  
21 classes. Domestic sales would drop and General Service sales  
22 would increase. The deficit would decrease by about \$720,000.

23 In this case, the effect of adopting a declining block  
24 structure is seen to outweigh the inhibiting effect of a rate  
25 increase.

1 Q. Do you recommend adoption of such a rate?

2 A. The idea illustrated by this example is that a declining block  
3 rate structure is appropriate when LRMC is below embedded  
4 cost. This is generally recognized to be the case and the  
5 idea can in my opinion be applied with advantage to the  
6 Isolated Systems.

7 However, this particular rate was constructed for purposes of  
8 illustration and is almost certainly sub-optimal in a number  
9 of respects. For example, allocation of classified costs to  
10 rate blocks is simplistic and block sizes are not necessarily  
11 appropriate. It is not intended as a model rate.

12 Q. Would rates of this type offset the effect of raising rates to  
13 recover the full cost of service?

14 A. No. To recover full cost, present rates would have to be  
15 raised by a factor of 3 or more, based on present sales.  
16 While declining block rates would ensure best results possible  
17 under any given level of cost recovery, increases of this  
18 magnitude would certainly result in shrinkage of the sales  
19 base. Such shrinkage has implications for rate policy.

20 Q. What are the rate implications?

21 A. My testimony has emphasized the desirability of giving correct  
22 price signals to customers. We now see from an examination of  
23 long-run costs that the costs of replacing or expanding  
24 existing capacity are in fact comparatively modest; that a  
25 restrictive policy regarding sales is not in the best  
26 interests of any stakeholder; and that massive rate increases  
27 would tend to have exactly that effect. Under the

1 circumstances, deciding what constitutes an appropriate price  
2 signal is not a trivial problem.

3 Q. What solution do you suggest?

4 A. Isolated System fixed costs comprise roughly \$26.6 millions or  
5 77% of the total cost of service. Of these, \$19.3 millions  
6 are related to production demand. This is a huge cost for  
7 systems with a total demand of less than 26 MW.

8 The high cost is mainly due to two factors: (1) the need to  
9 staff more than 30 powerhouses, and (2) the need to maintain  
10 an 80% capacity reserve. Both are direct consequences of the  
11 large number and small size of individual systems.

12 If these costs were to be recovered in energy rates, the price  
13 signal would be incorrect, or at least misconstrued. It would  
14 be interpreted as a message to use less energy, an action  
15 which would not reduce fixed costs by one iota.

16 It is therefore reasonable to conclude that generation fixed  
17 costs arising solely from the disadvantaged nature of these  
18 systems should be collected in the form of fixed charges.  
19 They should be offset by subsidy to the extent that subsidy is  
20 available. The balance of cost, if assigned to rates, would  
21 in my opinion provide a correct price signal.

22 It would be more practical, if this procedure were to be  
23 adopted, to pay the subsidy to the utility rather than to  
24 customers as suggested in my original evidence.

25 At the required filing time for that evidence, it had not been  
26 possible to examine system long-run costs and I had envisaged

1 that they would be more or less commensurate with embedded  
2 cost levels. It now appears that they are much lower.

3 Because of this, references to cost-based rates in the  
4 original testimony should be interpreted as rates reflecting  
5 causal responsibility for embedded costs exclusive of those  
6 fixed costs attributable to disadvantages of scale, and having  
7 a tail block rate at or moderately above long-run marginal  
8 cost.

9 Q. Do you wish to comment on any other aspects?

10 A. Yes. The wide variation of short-run marginal cost from  
11 system to system raises the question whether it is fair to  
12 apply uniform rates to all the Isolated Systems.

13 In his testimony during the recent generic hearing, Dr.  
14 Sarikas estimated that cost of service variations were within  
15 about 10% for all systems. That could well be correct,  
16 because the fixed costs relating to generation, transmission,  
17 distribution and customer service constitute more than three-  
18 quarters of the total cost of service and they probably do not  
19 vary much from place to place.

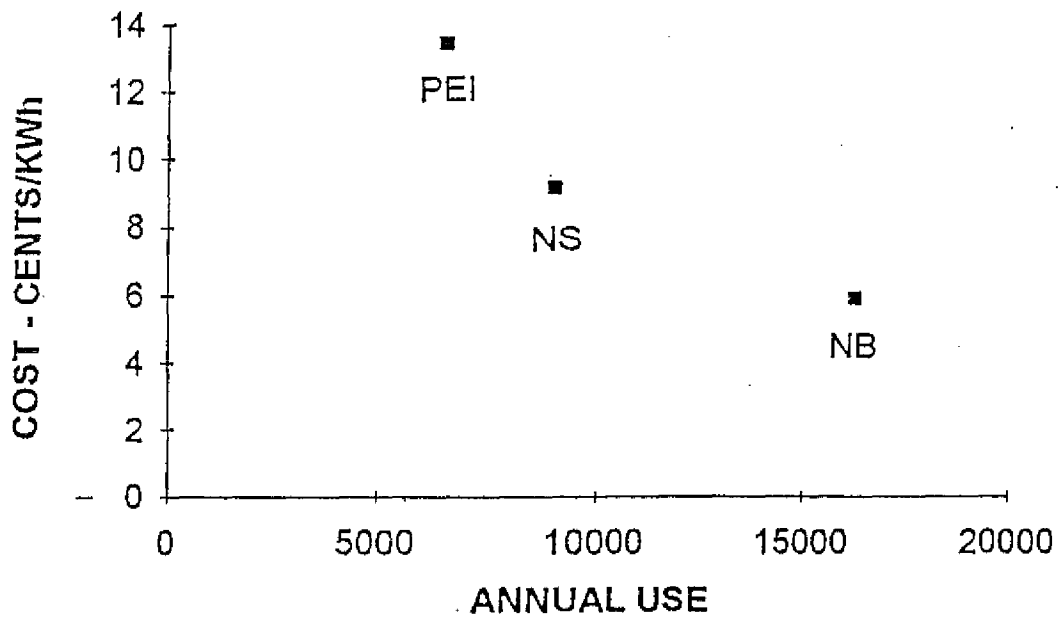
20 However, there is undoubtedly a large variation in energy  
21 costs, and the question I wish to raise is whether this would  
22 justify two (or perhaps more) rate zones differentiated by  
23 system size.

24 To do this would raise accounting, cost of service, and  
25 perhaps other problems, but would result in rates more  
26 reflective of individual system costs. The possibility is  
27 mentioned without recommendation in the hope of promoting  
28 further discussion.

1 Q. Does that conclude your testimony?

2 A. Yes, at this time.

AVERAGE ANNUAL RESIDENTIAL USE VS COST  
MARITIME PROVINCES ELECTRIC UTILITIES





NEWFOUNDLAND AND LABRADOR HYDRO  
ISOLATED SYSTEMS  
Short Run Marginal Cost

	[1] FUEL INPUT IC46	[2] FUEL COST IC46	[3] FUEL COST [1]*[2]	[4] SALES 1992 NP4	[5] SRMC [3]/[4]	
Source or calculation	Units	Kl	\$/l	\$(000's)	MWh	\$/KWh
<b>SYSTEM</b>						
[1] Black Tickle	406.13	0.244	99.10	1,100	0.0901	
[2] Cartwright	925.14	0.283	261.82	2,766	0.0947	
[3] Charlottetown	366.45	0.254	(a) 164.51	943	0.1745	
[4] Davis Inlet	537.41	0.247	132.74	1,300	0.1021	
[5] Francois	291.43	0.404	117.74	699	0.1684	
[6] Grey river	213.87	0.289	61.81	585	0.1057	
[7] Harbour Deep	315.86	0.238	75.18	760	0.0989	
[8] Hopedale	785.33	0.255	200.26	2,055	0.0975	
[9] La Poile	173.55	0.289	50.16	459	0.1093	
[10] Little Bay Islands	493.94	0.277	136.82	1,375	0.0995	
[11] l'Anse Au Loup	3065.00	0.229	701.89	8,418	0.0834	
[12] Makkovik	979.00	0.242	236.92	2,465	0.0961	
[13] Marys Harbour Diesel	723.55	0.243	175.82	2,370	0.0742	
[14] McCallum	200.94	0.289	58.07	575	0.1010	
[15] Mud Lake	96.00	0.299	28.70	171	0.1679	
[16] Nain	1523.23	0.245	373.19	4,267	0.0875	
[17] Norman Bay	80.91	0.261	21.12	74	0.2854	
[18] Paradise River	116.36	0.259	30.14	207	0.1456	
[19] Petite Forte	164.40	0.289	47.51	365	0.1302	
[20] Petites	128.15	0.289	37.03	296	0.1251	
[21] Port Hope Simpson	523.79	0.303	158.71	1,351	0.1175	
[22] Postville	392.50	0.250	98.13	1,001	0.0980	
[23] Ramea	2476.29	0.218	539.83	7,952	0.0679	
[24] Rencontre East	275.00	0.289	79.48	703	0.1131	
[25] Rigolet	435.00	0.283	123.11	1,110	0.1109	
[26] South East Bight	139.63	0.289	40.35	312	0.1293	
[27] St. Brendans	359.69	0.238	85.61	992	0.0863	
[28] St Lewis	467.10	0.245	114.44	1,293	0.0885	
[29] Westport	477.33	0.220	105.01	1,252	0.0839	
[30] Williams Harbour	161.60	0.249	40.24	319	0.1261	
[31] Subtotals			4,395	47,535	0.0925	
[32] Rod./St. A. (diesel)	6447.57	0.210	(a) 1,351			
[33] Rod./St. A. (wood)	59.73	31.200	(a) 1,963			
[34] Rod./St. A. (total)			3,314	44,440	0.0746	
[35] TOTALS			7,709	91,975	0.0838	

Note (a): Where data discrepancies occur the total fuel costs shown in column [3] follow NP-1(a).

NEWFOUNDLAND AND LABRADOR HYDRO  
BILLING FREQUENCY DATA  
Isolated Domestic diesel customers ( Rate 1.2)

Start of Interval	End of Interval	Number of Customer Bills	Kilowatt-Hours in Interval	Percent of Customer Bills	Cumulative percent of customer bills		
					Block 1	Block 2	Rem use
0	0	2987	0	3.7038	3.7038		
0	50	3147	3788937	3.9022	7.6061		
51	100	1682	3683981	2.0857	9.6917		
101	150	1575	3602216	1.9530	11.6447		
151	200	1656	3522532	2.0534	13.6981		
201	250	1812	3436173	2.2469	15.9450		
251	300	1991	3341258	2.4688	18.4138		
301	350	2280	3235729	2.8272	21.2410		
351	400	2554	3114506	3.1669	24.4079		
401	450	3054	2973884	3.7869	28.1948		
451	500	3557	2809344	4.4106	32.6055		
501	550	3859	2624897	4.7851	37.3906		
551	600	4048	2426776	5.0195	42.4100		
601	650	4175	2221934	5.1769	47.5870		
651	700	4246	2010814	5.2650	52.8520		
701	750	4373	1792080	5.4225		5.4225	
751	800	4101	1582408	5.0852		10.5077	
801	850	3905	1379722	4.8421		15.3498	
851	900	3602	1193997	4.4664		19.8162	
901	950	3303	1021114	4.0994		23.9156	
951	1000	2880	864635	3.5712		27.4868	
1001	1050	2564	727911	3.1793			3.1793
1051	1100	2156	609176	2.6734			5.8527
1101	1150	1777	512284	2.2035			8.0562
1151	1200	1504	429664	1.8649			9.9211
1201	1250	1247	361053	1.5463			11.4674
1251	1300	1033	304535	1.2809			12.7483
1301	1350	848	257620	1.0515			13.7998
1351	1400	688	219989	0.8283			14.6281
1401	1450	569	188094	0.7056			15.3337
1451	1500	464	162681	0.5754			15.9090
1501	1550	337	142805	0.4179			16.3269
1551	1600	330	125646	0.4092			16.7361
1601	1650	243	111644	0.3013			17.0374
1651	1700	218	100295	0.2703			17.3077
1701	1750	178	90282	0.2207			17.5285
1751	1800	171	81738	0.2120			17.7405
1801	1850	127	74419	0.1575			17.8980
1851	1900	131	67734	0.1624			18.0604
1901	1950	106	61989	0.1314			18.1919
1951	2000	99	56878	0.1228			18.3146
2001	2500	517	395865	0.6411			18.9557
2501	3000	260	208897	0.3224			19.2781
3001	3500	130	118274	0.1612			19.4393
3501	4000	76	67816	0.0942			19.5335
4001	4500	34	42901	0.0422			19.5757
4501	5000	19	29081	0.0236			19.5992
5001	6000	16	40741	0.0198			19.6191
6001	7000	12	26391	0.0149			19.6340
7001	8000	6	19881	0.0074			19.6414
> 8000		16	458150	0.0198			19.6612
Total All Intervals		80646	56721371	100.0000	52.8520	27.4868	19.6612

NEWFOUNDLAND AND LABRADOR HYDRO  
BILLING FREQUENCY DATA  
General service diesel customers (Rate 2.5)

Start of Interval	End of Interval	Number of Customer Bills	Kilowatt-Hours in Interval	Percent of Customer Bills	Cumulative percent of customer bills	
					Block 1	Rem use
0	0	1570	0	12.5070	12.5070	
0	50	1124	514149	8.9540	21.4610	
51	100	535	478943	4.2619	25.7229	
101	150	345	457420	2.7483	28.4713	
151	200	322	440767	2.5651	31.0364	
201	250	312	425845	2.4855	33.5219	
251	300	326	409241	2.5970	36.1189	
301	350	349	393003	2.7802	38.8991	
351	400	376	374291	2.9953	41.8944	
401	450	287	357725	2.2863	44.1807	
451	500	260	344014	2.0712	46.2519	
501	550	272	330861	2.1668	48.4187	
551	600	267	317288	2.1270	50.5457	
601	650	276	303958	2.1987	52.7444	
651	700	212	291435	1.6888	54.4332	
701	750	243	279654	1.9358		1.9358
751	800	185	269501	1.4738		3.4095
801	850	197	260091	1.5693		4.9789
851	900	186	250338	1.4817		6.4606
901	950	171	241393	1.3622		7.8228
951	1000	189	232675	1.5056		9.3284
1001	1050	153	223847	1.2188		10.5473
1051	1100	183	215365	1.4578		12.0051
1101	1150	144	207090	1.1471		13.1522
1151	1200	145	200347	1.1551		14.3073
1201	1250	120	193632	0.9559		15.2633
1251	1300	136	187000	1.0834		16.3467
1301	1350	125	180407	0.9958		17.3425
1351	1400	137	174028	1.0914		18.4338
1401	1450	101	168099	0.8046		19.2384
1451	1500	100	162976	0.7966		20.0351
1501	1550	91	157981	0.7249		20.7600
1551	1600	114	153230	0.9081		21.6681
1601	1650	95	148053	0.7568		22.4249
1651	1700	81	143199	0.6453		23.0702
1701	1750	54	139835	0.4302		23.5004
1751	1800	110	136168	0.8763		24.3766
1801	1850	63	131734	0.5019		24.8785
1851	1900	75	128081	0.5975		25.4760
1901	1950	70	124358	0.5576		26.0336
1951	2000	83	120911	0.6612		26.6948
2001	2500	563	1035152	4.4850		31.1798
2501	3000	312	825101	2.4855		33.6653
3001	3500	235	684120	1.8721		35.5373
3501	4000	185	582335	1.4738		37.0111
4001	4500	142	500374	1.1312		38.1423
4501	5000	83	447534	0.6612		38.8035
5001	6000	145	772809	1.1551		39.9586
6001	7000	115	645771	0.9161		40.8747
7001	8000	78	544765	0.6214		41.4961
>8000		511	5233856	4.0707		45.5668
Total All Intervals		12553	21540750	100.0000	54.4332	45.5668

NEWFOUNDLAND AND LABRADOR HYDRO  
ISOLATED SYSTEMS

Comparison of Marginal Revenue and Cost

[1] Marginal Revenue: Domestic Diesel Customers

For a small reduction in use by all customers or by a random selection of all customers the average decrease per KWh at present rates would be:

	Block 1	Block 2	Rem use
Price per KWh; present rates	\$ 0.0654	0.0961	0.1302
Percent of bills in block	52.8520	27.4868	19.6612
Block reduction per KWh	\$ 0.0346	0.0264	0.0256
Total reduction: \$/ KWh	0.0866		

[2] Marginal Revenue: General Service Diesel Customers

For a small reduction in use by all customers or by a random selection of all customers the average decrease per KWh at present rates would be:

	Block 1	Rem use
Price per KWh; present rates	\$ 0.0858	0.1954
Percent of bills in block	54.4332	45.5668
Block reduction per KWh	\$ 0.0467	0.0890
Total reduction: \$/ KWh	0.1357	

[3] Marginal cost of diesel generation (fuel only)

Fuel cost for the isolated systems, (\$000's)	\$ 7,709.5
Sales (MWh), per GCB 2.5	91,975
Short-run marginal cost, overall	0.0838
Short-run marginal cost, excluding Roddickton/ St. Anthony	0.0925
As above, for the 23 most expensive systems (20,991MWh)	0.1096

**NEWFOUNDLAND AND LABRADOR HYDRO  
ISOLATED AREA GENERATING PLANTS  
Calculation of long-run marginal cost**

	[1] Largest present unit KW	[2] Date of next Unit	[3] Scale factor (optimum)	[4] Unit size (optimum) KW	[5] Cost, year of addition \$000s	[6] Gross cost, (Note 1) \$000s	[7] Deferral value \$000s
<b>SYSTEM</b>							
[1] Black Tickle	270	2016	0.50	135	293	411.2	27.3
[2] Cartwright	405	2004	1.25	506	938	1314.6	87.2
[3] Charlottetown	270	1998	N/A	300	250	350.5	23.3
[4] Davis Inlet	225	1993	0.55	125	193	270.0	17.9
[5] Francois	250	1998	0.20	50	87	122.6	8.1
[6] Grey River	250	1997	0.30	75	130	182.7	12.1
[7] Harbour Deep	250	2045	1.80	425	2,528	3544.1	235.2
[8] Hopedale	270	1999	1.00	270	469	657.6	43.6
[9] La Poile	250	2024	0.20	50	180	251.7	16.7
[10] Little Bay Islands	450	N/A	N/A	0	0	0.0	0.0
[11] l'Anse Au Loup	1000	1996	N/A	1100	1,101	1543.4	102.4
[12] Makkovik	500	2008	1.00	500	986	1382.5	91.7
[13] Marys Harbour D.	270	1998	1.35	365	601	842.5	55.9
[14] McCallum	250	2015	0.64	160	439	615.2	40.8
[15] Mud Lake	55	2010	2.35	130	306	429.5	28.5
[16] Nain	350	1997	1.45	510	743	1041.3	69.1
[17] Norman Bay	30	2022	3.33	100	327	458.5	30.4
[18] Paradise River	55	N/A	N/A	0	0	0.0	0.0
[19] Petite Forte	136	N/A	N/A	0	0	0.0	0.0
[20] Petites	200	N/A	N/A	0	0	0.0	0.0
[21] Port Hope Simpson	350	1994	N/A	450	851	1193.3	79.2
[22] Postville	225	1995	N/A	300	250	350.5	23.3
[23] Ramea	1000	2000	1.00	1000	1,419	1988.5	132.0
[24] Rencontre East	300	2052	0.25	75	564	790.7	52.5
[25] Rigolet	225	1995	1.35	305	472	661.2	43.9
[26] South East Bight	136	2006	1.40	190	427	598.5	39.7
[27] St. Brendans	300	2029	0.67	200	788	1104.5	73.3
[28] St Lewis	225	2003	1.50	340	644	903.0	59.9
[29] Westport	250	1996	0.64	160	265	370.8	24.6
[30] Williams Harbour	125	2148	2.00	250	23,133	32429.1	2,152
[31] Total Roddickton/							
[32] St. Anthony	2000	1994		2600	730	1023.4	67.9
[33] Total							

Note 1: Gross cost is the capital cost multiplied by infinite series and fixed expense factors.

Factors used:	Infinite series factor	1.219
	Fixed expense factor	1.15
	Deferral value factor	0.066

NEWFOUNDLAND AND LABRADOR HYDRO  
ISOLATED AREA GENERATING PLANTS  
Calculation of long-run marginal cost

	[7] Deferral value \$000s	[8] Present Worth 1992 \$000s	[9] Gross LRMC \$/KW	[10] Sales at meter 1992 MWh	[11] Load at system 1992 KW	[12] Gross LRMC \$/KWh
SYSTEM						
[1] Black Tickle	27.3	2.77	25.7	1100	489	0.011
[2] Cartwright	87.2	27.80	68.7	2766	737	0.018
[3] Charlottetown	23.3	13.13	54.7	943	387	0.022
[4] Davis Inlet	17.9	16.29	162.9	1300	325	0.041
[5] Francois	8.1	4.59	114.8	699	269	0.044
[6] Grey River	12.1	7.53	125.4	585	237	0.051
[7] Harbour Deep	235.2	1.51	4.4	760	307	0.002
[8] Hopedale	43.6	22.39	103.7	2055	604	0.030
[9] La Poile	16.7	0.79	19.8	459	185	0.008
[10] Little Bay Islands	0.0	0.00	0.0	1375	604	0.000
[11] l'Anse Au Loup	102.4	69.96	79.5	8418	2623	0.025
[12] Makkovik	91.7	19.97	49.9	2465	855	0.017
[13] Marys Harbour D.	55.9	31.56	108.1	2370	676	0.031
[14] McCallum	40.8	4.56	35.6	575	202	0.013
[15] Mud Lake	28.5	5.13	49.3	171	74	0.021
[16] Nain	69.1	42.91	105.2	4267	913	0.023
[17] Norman Bay	30.4	1.74	21.8	74	51	0.015
[18] Paradise River	0.0	0.00	0.0	207	85	0.000
[19] Petite Forte	0.0	0.00	0.0	365	140	0.000
[20] Petites	0.0	0.00	0.0	296	132	0.000
[21] Port Hope Simpson	79.2	65.45	181.8	1351	472	0.064
[22] Postville	23.3	17.47	72.8	1001	291	0.021
[23] Ramea	132.0	61.56	77.0	7952	2509	0.024
[24] Rencontre East	52.5	0.17	2.9	703	243	0.001
[25] Rigolet	43.9	32.97	135.1	1110	126	0.015
[26] South East Bight	39.7	10.46	68.8	312	143	0.032
[27] St. Brendans	73.3	2.16	13.5	992	354	0.005
[28] St Lewis	59.9	21.00	77.2	1293	330	0.020
[29] Westport	24.6	16.81	131.3	1252	468	0.049
[30] Williams Harbour	2,152	0.00	0.0	319	114	0.000
[31] Total				47535		
Roddickton/						
[32] St. Anthony	67.9	56.13	27.0	44440	11998	0.007
[33] Total				91975		



NEWFOUNDLAND AND LABRADOR HYDRO  
DIESEL UNIT REPLACEMENT COSTS  
Under current planning assumptions

Line	SYSTEM	[1] Unit size  KW	[2] In service Year	[3] Years to Retire- ment n	[4] Replace- ment cost \$000s	[5] Deferral value \$000s	[6] present worth 1992 \$000s
1	Black Tickle	225	1978	11	440.34	40.96	14.36
2		270	1978	11	521.81	48.54	17.01
3		270	1978	11	521.81	48.54	17.01
4	Cartwright	405	1987	20	957.10	89.04	13.23
5		405	1992	25	1,093.48	101.72	9.39
6		405	1978	11	753.05	70.05	24.55
7		270	1987	20	663.21	61.70	9.17
8	Charlottetown	125	1978	11	251.42	23.39	8.20
9		270	1975	8	481.73	44.81	20.91
10		225	1986	19	544.94	50.69	8.29
11	Davis Inlet	225	1985	18	530.62	49.36	8.88
12		220	1974	7	387.57	36.05	18.50
13		125	1975	8	232.10	21.59	10.07
14		125	1975	8	232.10	21.59	10.07
15	Francois	100	1980	13	213.57	19.87	5.76
16		250	1980	13	512.46	47.67	13.81
17		200	1971	4	327.07	30.43	20.78
18	Grey River	250	1989	22	651.33	60.59	7.44
19		136	1975	8	251.78	23.42	10.93
20		136	1975	8	251.78	23.42	10.93
21	Harbour Deep	136	1975	8	251.78	23.42	10.93
22		136	1979	12	280.09	26.06	8.30
23		136	1980	13	287.65	26.76	7.75
24		250	1974	7	436.76	40.63	20.85
25	Hopedale	180	1980	13	376.19	35.00	10.14
26		270	1975	8	481.73	44.81	20.91
27		270	1975	8	481.73	44.81	20.91
28		225	1974	7	395.83	36.82	18.90
29	La Poile	136	1986	19	337.52	31.40	5.13
30		250	1980	13	512.46	47.67	13.81
31		90	1980	13	192.73	17.93	5.19
32	Little Bay Islands	300	1980	13	606.37	56.41	16.34
33		450	1987	20	1,049.48	97.63	14.51
34		300	1980	13	606.37	56.41	16.34
35		300	1979	12	590.43	54.93	17.50
36	l'Anse Au Loup	720	1981	14	1,316.84	122.50	32.26
37		720	1976	9	1,152.60	107.22	45.47
38		1000	1984	17	1,802.84	167.71	33.18
39		540	1974	7	867.01	80.66	41.39
40		540	1974	7	867.01	80.66	41.39



41	Makkovik	500	1990	23	1,244.44	115.77	12.93
42		500	1990	23	1,244.44	115.77	12.93
43		400	1980	13	785.60	73.08	21.17
44		225	1978	11	440.34	40.96	14.36
45	Marys Harbour D.	165	1980	13	346.25	32.21	9.33
46		270	1974	7	469.06	43.64	22.39
47		225	1975	8	406.51	37.82	17.64
48		225	1975	8	406.51	37.82	17.64
49	McCallum	250	1989	22	651.33	60.59	7.44
50		136	1975	8	251.78	23.42	10.93
51		136	1975	8	251.78	23.42	10.93
52	Mud Lake	55	1975	8	104.05	9.68	4.52
53		45	1980	13	97.52	9.07	2.63
54		45	1982	15	102.86	9.57	2.29
55	Nain	270	1978	11	521.81	48.54	17.01
56		270	1978	11	521.81	48.54	17.01
57		350	1975	8	610.44	56.79	26.49
58		270	1974	7	469.06	43.64	22.39
59		270	1980	13	550.37	51.20	14.83
60	Norman Bay	30	1987	20	78.66	7.32	1.09
61		30	1987	20	78.66	7.32	1.09
62		30	1987	20	78.66	7.32	1.09
63	Paradise River	55	1971	4	93.54	8.70	5.94
64		35	1971	4	59.84	5.57	3.80
65		55	1971	4	93.54	8.70	5.94
66	Petite Forte	55	1971	4	93.54	8.70	5.94
67		136	1978	11	272.73	25.37	8.89
68		136	1980	13	287.65	26.76	7.75
69	Petites	200	1990	23	542.60	50.48	5.64
70		90	1974	7	164.26	15.28	7.84
71		90	1974	7	164.26	15.28	7.84
72	Port Hope Simpson	350	1971	4	548.73	51.05	34.87
73		225	1974	7	395.83	36.82	18.90
74		225	1980	13	464.44	43.21	12.51
75		125	1975	8	232.10	21.59	10.07
76	Postville	75	1976	9	144.95	13.48	5.72
77		75	1976	9	144.95	13.48	5.72
78		225	1978	11	440.34	40.96	14.36
79		155	1987	20	393.02	36.56	5.43
80	Ramea	1000	1971	4	1,275.09	118.62	81.02
81		442	1971	4	674.66	62.76	42.87
82		568	1977	10	979.44	91.11	35.13
83		1000	1980	13	1,620.60	150.76	43.67
84		426	1972	5	670.94	62.42	38.76
85		500	1970	3	730.41	67.95	51.05
86	Rencontre East	136	1980	13	287.65	26.76	7.75
87		300	1975	8	530.75	49.37	23.03
88		250	1986	19	601.29	55.94	9.15

89	Rigolet	165	1974	7	295.10	27.45	14.09
90		225	1974	7	395.83	36.82	18.90
91		125	1980	13	265.18	24.67	7.15
92		90	1982	15	203.28	18.91	4.53
93	Roddickton/St. A.	350	1975	8	610.44	56.79	26.49
94		1000	1975	8	1,418.48	131.96	61.56
95		1000	1977	10	1,496.11	139.18	53.66
96		850	1980	13	1,450.48	134.93	39.09
97		850	1980	13	1,450.48	134.93	39.09
98		450	1986	19	1,021.89	95.06	15.54
99		1000	1973	6	1,344.88	125.11	70.62
100		1000	1973	6	1,344.88	125.11	70.62
101		1000	1973	6	1,344.88	125.11	70.62
102		2000	1980	13	2,096.52	195.03	56.49
103		2000	1982	15	2,211.26	205.71	49.24
104		850	1980	13	1,450.48	134.93	39.09
105		1000	1975	8	1,418.48	131.96	61.56
106		850	1980	13	1,450.48	134.93	39.09
107	South East Bight	136	1987	20	346.63	32.25	4.79
108		136	1980	13	287.65	26.76	7.75
109		55	1974	7	101.32	9.43	4.84
110	St. Brendans	300	1975	8	530.75	49.37	23.03
111		300	1974	7	516.79	48.08	24.67
112		250	1974	7	436.76	40.63	20.85
113	St Lewis	220	1974	7	387.57	36.05	18.50
114		225	1975	8	406.51	37.82	17.64
115		125	1978	11	251.42	23.39	8.20
116		125	1978	11	251.42	23.39	8.20
117	Westport	250	1974	7	436.76	40.63	20.85
118		250	1980	13	512.46	47.67	13.81
119		250	1974	7	436.76	40.63	20.85
120	Williams Harbour	75	1980	13	161.25	15.00	4.35
121		75	1980	13	161.25	15.00	4.35
122		125	1975	8	232.10	21.59	10.07
123	Totals	40914	241343				2378.36
124	No. of Units	122					
125	Average size	335.3607					
	Average age		13.77869				
126	Marginal replacement cost, \$/KW						58.13
127	Marginal replacement cost, \$/KWh						0.0259
128	Marginal replacement cost excluding Rod./St. A., \$/KW						64.21
	As above, \$/KWh						0.0361

**NEWFOUNDLAND AND LABRADOR HYDRO**  
**Isolated System Rate yields**  
**Present rates vs marginal cost-based rates**

**[1] Classified costs**

Gen. demand	19,266,928	Dist. D.	3,005,825	Total	34,593,127
Energy	9,621,705	Dist. Cust.	1,040,173	Subsidy	23,605,508
Transmission	789,679	Cust.	780,883	Net	<u>10,987,619</u>
		St. Ltg.	87,934		

**[2] Subsidy set against fixed cost**

Gen. demand	0	Dist. D.	1,081,705	Total	10,987,619
Energy	7,996,924	Dist. C	1,040,173	Subsidy	0
Transmission	0	Cust.	780,883	Net	<u>10,987,619</u>
		St. Ltg.	87,934		

**[3] Unit classified costs**

Customer cost; \$/Month		$(\$1,040,173 + \$780,883) / (6,779 \times 12) =$	22.39
Energy cost; \$/KWh		$\$7,996,924 / 91,975,000 \text{KWh} =$	0.08695
Dist. dmd. cost - domestic; \$/KWh		$\$1,081,705 * .6198 / 42,792,981 \text{KWh} =$	0.01567
Dist. dmd. cost - GS; \$/KWh		$\$1,081,705 * .2408 / 5438940 \text{KWh} =$	0.04789
LRMC; \$/KWh			0.0145

**[4] REVENUE COMPARISON**

ITEM	PRESENT RATES			MARGINAL COST RATES		
	Rate	Quantity	Yield \$	Rate	Quantity	Yield \$
<b>Domestic</b>						
S.C.	16.67	6,779	1,356,071	22.39	6779	1,821,382
1 B E	0.06541	42,792,981	2,799,089	0.10261	41,872,969	4,296,744
2 B E	0.09606	7,833,956	752,530	0.10145	7,729,623	784,145
3 B E	0.13022	6,094,434	793,617	0.10145	6,579,393	667,479
Total			<u>5,701,307</u>			<u>7,569,750</u>
<b>General Svc.</b>						
S. C.	18.97	1,047	238,339	22.39	1,047	281,308
1 B E	0.0858	5,438,940	466,661	0.13484	5,356,924	722,314
2 B E	0.1954	16,101,810	3,146,294	0.10145	17,068,515	1,731,545
TOTAL			<u>3,851,294</u>			<u>2,735,166</u>
Church & Sch.			292,622			
Special			687			
GS 0-10 KW			567			
GS 10-100 KW			39,797			
GS 110-1000			732,556			
St. Ltg.			239,253			
Subtotal			1,305,482			1,305,482
Stabilization & Misc.			129,536			129,536
<b>ALL REVENUE</b>			<u>10,987,619</u>			<u>11,739,934</u>

**NEWFOUNDLAND AND LABRADOR HYDRO**  
**Elasticity effects in the isolated systems**

In this example the price elasticity of demand is assumed to be -0.1 for all energy blocks.

DOMESTIC CLASS	NO. OF BILLS	BLOCK 1 ENERGY	BLOCK 2 ENERGY	BLOCK 3 ENERGY	TOTAL ENERGY
TOTALS	80646	42,792,981	7,833,956	6,094,434	56,721,371
Block 3 bills	15856	11,099,200	<u>4,756,800</u>	<u>6,094,434</u>	21,950,434
Block 2 bills	22167	<u>15,516,900</u>	<u>3,077,156</u>	0	18,594,056
Block 1 bills	42623	16,176,881	0	0	16,176,881
Elasticity effects:		BLOCK 1	BLOCK 2	BLOCK 3	
Present rate		0.06541	0.09606	0.13022	
New rate		0.10261	0.10145	0.10145	
Change, pu		1.5687204	1.0561108	0.7790662	
Change in sales		-0.056872	-0.005611	0.0220934	
Present block bill totals		16,176,881	18,594,056	21,950,434	
Adjusted block bill totals		15,256,869	18,489,723	22,435,393	56181985
ADJUSTED BLOCK TOTALS		BLOCK 1 ENERGY	BLOCK 2 ENERGY	BLOCK 3 ENERGY	TOTAL ENERGY
Block 3 bills	15856	11,099,200	4,756,800	6,579,393	
Block 2 bills	22167	15,516,900	2,972,823		
Block 1 bills	42623	<u>15,256,869</u>			
Block energy totals		41,872,969	<u>7,729,623</u>	<u>6,579,393</u>	56,181,985
GS CLASS (Rate 2.5)	NO. OF BILLS	BLOCK 1 ENERGY	BLOCK 2 ENERGY		TOTAL ENERGY
TOTALS	12553	5,438,940	16,101,810		21,540,750
Block 2 bills	5720	<u>4,004,000</u>	<u>16,101,810</u>		20,105,810
Block 1 bills	6833	1,434,940	0		1,434,940
Elasticity effects:		BLOCK 1	BLOCK 2		
Present rate		0.0858	0.1954		
New rate		0.13484	0.10145		
Change, pu		1.5715618	0.5191914		
Change in sales		-0.057156	0.0480809		
Present block bill totals		1,434,940	20,105,810		
Adjusted block bill totals		1,352,924	21,072,515		
ADJUSTED BLOCK TOTALS		BLOCK 1 ENERGY	BLOCK 2 ENERGY		TOTAL ENERGY
Block 2 bills	5720	4,004,000	17,068,515		21,072,515
Block 1 bills	6833	<u>1,352,924</u>			1,352,924
Block energy totals		5,356,924	<u>17,068,515</u>		22,425,439
		Domestic	GS	Total	
Sales under present rates		56,721,371	21,540,750	78,262,121	
Sales after rate change		56,181,985	22,425,439	78,607,424	

DESIRABLE ATTRIBUTES OF UTILITY RATES

(Reproduced from Bonbright et al.;  
Principles of Public Utility Rates; 1988)

Revenue-related Attributes:

1. Effectiveness in yielding total revenue requirements under the fair-return standard without any socially undesirable expansion of the rate base or socially undesirable level of product quality and safety.
2. Revenue stability and predictability, with a minimum of unexpected changes seriously adverse to utility companies.
3. Stability and predictability of the rates themselves, with a minimum of unexpected changes seriously adverse to ratepayers and with a sense of historical continuity. (Compare "The best tax is an old tax".)

Cost-related Attributes:

4. Static efficiency of the rate classes and rate blocks in discouraging wasteful use of the service while promoting all justified types and amounts of use:
  - (a) in the control of the total amounts of service supplied by the company;
  - (b) in the control of the relative uses of alternative types of service by ratepayers (on-peak versus off-peak service or higher quality versus lower quality service).
5. Reflection of all of the present and future private and social costs and benefits occasioned by a service's provision (i.e., all internalities and externalities).
6. Fairness of the specific rates in the apportionment of total costs of service among the different ratepayers so as to avoid arbitrariness and capriciousness and to attain equity in three dimensions: (1) horizontal (i.e., equals treated equally); (2) vertical (i.e., unequals treated unequally); and (3) anonymous (i.e., no ratepayer's demands can be diverted away uneconomically from an incumbent by a potential entrant).

7. Avoidance of undue discrimination in rate relationships so as to be, if possible, compensatory (i.e., subsidy free with no intercustomer burdens).
8. Dynamic efficiency in promoting innovation and responding economically to changing demand and supply patterns.

Practical-related Attributes:

9. The related, practical attributes of simplicity, certainty, convenience of payment, economy in collection, understandability, public acceptability, and feasibility of application.
10. Freedom from controversies as to proper interpretation.

AN OVERALL ESTIMATE OF LONG-RUN MARGINAL COST  
IN NEWFOUNDLAND & LABRADOR HYDRO  
ISOLATED RURAL SYSTEMS

1. Summary.

The peaker method of determining long-run marginal cost (LRMC) is used for purposes of this estimate. However, some modifications have been made to adapt it to diesel generation, the only plausible source of new capacity in these small systems.

Separate estimates were made for each isolated system; in most cases by determining the year in which new capacity would be needed, the optimum unit size and cost. There were two exceptions. In the case of systems for which specific expansion plans now exist, Hydro's timing, unit sizes and costs were used [IC-40 and GCB-10(b)]. The other exception involved systems where zero growth was forecast (Little Bay Islands, Paradise River and Petites), and Petite Forte where no future beyond 1993 is forecast. In these cases, marginal cost was taken to be zero.

Estimates for individual systems were then weighted to reflect relative size, and the weighted increments were added to give an estimate of average long-run marginal cost in the Isolated Systems as a whole.

The resulting figures are:

Isolated Rural Systems overall: \$.0145 per KWh  
As above, but excluding Roddickton/St. Anthony: \$.0212 per KWh.

The methods used here were dictated by limitations of both data and resources. The results are inferior to those available through a system planning approach, and estimates for individual systems may contain substantial error. The overall estimate is sensitive to some of the assumptions made but is regarded as a reasonable indication of the true cost of system growth.

2. Economic Assumptions.

The following rates were used:

Interest:	10% per annum.
Construction price escalation:	2.7% per annum.
Fuel price escalation:	5.06% per annum.

The figures are based on Hydro's current system planning assumptions as reported in GCB-10(c). Whether or not they are best estimates of future conditions, they are the figures used in the planning of Hydro's system.

3. Isolated System Data.

Hydro's responses to various demands provided input information for the study. The data and load growth rates calculated therefrom are set out in Schedules 1, 2 and 3 attached.

4. Unit Efficiency versus Size.

The variation of unit efficiency with unit size is an important factor in determining the optimum size of new units. In any actual expansion, manufacturer's data would probably be used, but for present purposes this appeared impractical. Data published by the National Energy Board was used to construct an empirical curve, and the parameters were adjusted to fit reported heat rates in the Isolated Systems with least mean square error. This resulted in the following equation, which was used to calculate operating costs for all scenarios:

$$\text{Heat rate (KJ/KWh)} = 11,246 + 2.627 \text{ E}+08 / [(\text{KW}) + 137.97]^2$$

When applied to Hydro's Isolated Systems, this expression yields estimates with a standard deviation of about 5%.

5. Unit Costs.

Capacity additions necessarily involve the cost of prime mover and generator, but may or may not incur further costs for powerhouse construction, additional fuel storage, increased substation capacity, etc. For purposes of this study it was assumed that the capacity increases now planned by Hydro [IC-40 and GCB-10(b)] would provide a representative view of the average costs incurred in capacity increments. Linear regression of this data resulted in costs of \$(1551-.4048(KW)) per KW of added capacity in 1992 dollars and this basis of costing has been used.



## 6. Criteria and Timing of System Additions.

Hydro's criteria have been followed. Firm capacity has been taken as total installed capacity less that of the largest unit. Capacity additions are assumed to be made in the first year in which system peak demand exceeds existing firm capacity.

In nearly all cases, it was found that application of this rule enabled peak demands to be met with no unit operating at over 80% of rated output. Where any significant increase over 80% was found necessary, the year of addition was advanced to eliminate it.

The rate of load growth assumed for study purposes is the compound rate implied by forecast loads from 1993 to 1997 (NP4). In one or two cases where the rate of increase was high, appeared to result from specific large load additions in specific years and was not paralleled by similar increases in the 1988-92 period, the rate was arbitrarily decreased.

In most cases where rates differed for demand and energy, the average rate was used. The growth rates so determined were assumed to be maintained indefinitely. For most systems, the rate is very modest.

## 7. Optimum Unit Size.

The unit size for each system was determined on a least-cost basis, considering only unit capital and fuel costs. The latter were determined by simulation of system operation over a 26-year period and taking the present worth at the year of addition.

Simulations were based on load duration curves which accurately reflect peak demand, load factor and energy requirement in each system, but only roughly approximate typical actual load curve shapes.

Defining the size of the additional unit as the ratio of its capacity to that of the largest existing unit, it was found that under the computational framework used, total cost increases as the ratio increases from zero to 1.0, tends to dip to a minimum for some value in excess of 1.0 and then increases indefinitely with further increase in unit size.

The minimum at zero unit size is not a practical solution. In real life the cost of making frequent, small additions to plant would be found prohibitive and the fact that it was not so found in the model used is due to the simple cost function employed. For study purposes an arbitrary minimum size

capable of meeting growth through the simulation period was applied. Where lesser cost resulted from unit size ratios above 1.0, the minimum in that region was selected.

Results of applying this procedure are reasonably similar to the pattern of additions actually made in the past as disclosed by unit sizes and dates provided by Hydro (GCB-2.1). In general, addition of unit capacity greater than that of the largest existing unit is more attractive where the existing units are small, where load factor is comparatively high, and where the year of addition lies far in the future. In the latter case energy costs are inflated more than capacity costs and efficiency becomes the most important factor.

The unit capacities selected are detailed in Exhibit 3, page 1, column 4.

#### 8. Application of the Peaker Method.

The present worth in the in-service year of the selected option is converted into the \$1992 long-run marginal cost per KWh of sales by means of the following steps:

1. The capacity cost in the in-service year is grossed up to account for the present worth over life of all other fixed costs associated with the option. In the general case, where the capacity addition is usually a new plant, the factor tends to fall in the range 1.3 to 1.4. Additions to Hydro's Isolated Systems are considered almost always to consist of additional units operating in a single powerhouse, with additional staffing requirements amounting to little or nothing. A factor of 1.15 has therefore been used.
2. The capacity cost determined in step 1 above is grossed up to reflect replacement costs involved in maintaining the added capacity in perpetuity. The factor is

$$1/[1 - \{(1+I)/(1+x)\}^n]$$

where I is the inflation rate, x is the interest rate and n is the number of years between successive replacements. Under the assumptions used herein, the factor is 1.219.

3. A deferral value factor is next applied to convert the total present worth cost resulting from step 2 into an annual cost. The deferral value factor is

$$(x - I)/(1 + x)$$

which under the study assumptions amounts to .06636.

4. The deferral value is present-worthed from the in-service year to 1992, using the discount factor  $1/(1+x)^{(ISY-1992)}$ .
5. The annual cost resulting from step 4 is converted to a cost per KW of additional capacity provided. The amount of additional capacity should be taken as the firm capacity in order to reflect the reserve requirements of the system. In the Isolated Systems, an addition smaller than the largest existing unit will usually increase firm capacity by an equal amount, while an addition larger than the largest existing unit will increase firm capacity only by the rating of the largest existing unit. However, as the systems increase in size the .8 unit loading requirement will sooner or later become the ruling factor. For this reason, the capacity addition has been taken as .8 times rated KW in every case.
6. The per-KW costs determined in step 5 are converted to per-KWh costs. To do this, and account for system losses, the conversion factor is the ratio of system sales at meter to system peak demands at generator.
7. Steps 1 through 5 above determine the long-run marginal cost of capacity by means of the peaker method and they would be sufficient if the source of additional capacity was in fact a peaker, or if costs in excess of the cost of gas turbines were to be separately accounted for as energy costs.

Neither of these conditions is met in the present case. The total capital cost of diesel generation was used and the size of the capacity addition was decided partly on the basis of comparative energy costs. It is therefore appropriate to track the effect of the additional capacity on energy costs and to reflect any changes in the per KWh marginal costs.

Simulation shows that where the added capacity is small compared to the largest existing unit, it will operate at a comparatively low capacity factor. That is, it will perform a peaking function in the system. Under such circumstances no adjustment to energy costs has been made.

However, where the new unit is the largest in the system, it will be loaded to the full extent permitted by the system load duration curve. Under this circumstance it will provide a reduction in energy costs, and the per-KWh marginal cost is adjusted to reflect this reduction. The energy savings are computed as the production of the added unit multiplied by the difference in heat rate

between the added unit and the largest existing unit and by the fuel cost. This procedure slightly underestimates the energy benefits. Annual savings are present-worthed to the in-service date. Designating the ratio of PW savings to capital cost as  $F$ , the per-KWh cost of capacity as calculated in step 6 is reduced to  $(1 - F)$  of that amount.

8. Computation of LRMC for all Isolated Systems as a group.

The LRMC calculated for each system is multiplied by its share of the total Isolated Systems energy requirement, to determine its weighted contribution to the overall LRMC. The contributions of all the individual systems are then summed to arrive at the per-KWh LRMC for Hydro's Isolated Systems overall.

9. Results.

The results of applying each of the foregoing steps are set out in Exhibit 3.

NEWFOUNDLAND AND LABRADOR HYDRO  
ISOLATED AREA GENERATING PLANT DATA

	[1]	[2]	[3]	[4]	[5]	[6]	[7]	[8]	[9]	[10]	
	GENERATING UNIT CAPACITIES							TOT.	FIRM	PEAK	
								Cap'y	Cap'y.	LOAD	
	Data source	GCB2.1	GCB2.1	GCB2.1	GCB2.1	GCB2.1	GCB2.1	GCB2.1	[8]-[1]	GCB2.2	
	Units	KW	KW	KW	KW	KW	KW	KW	KW	KW	
	SYSTEM										
[1]	Black Tickle	270	270	225				765	495	489	
[2]	Cartwright	405	405	405	270			1485	1080	737	
[3]	Charlottetown	270	225	125				620	350	387	
[4]	Davis Inlet	225	220	125	125			695	470	325	
[5]	Francois	250	200	100				550	300	269	
[6]	Grey river	250	136	136				522	272	237	
[7]	Harbour Deep	250	136	136	136			658	408	307	
[8]	Hopedale	270	270	225	180			945	675	604	
[9]	La Poile	250	136	90				476	226	185	
[10]	Little Bay Islands	450	300	300	300			1350	900	604	
[11]	L'Anse Au Loup	1000	720	720	540	540		3520	2520	2636	
[12]	Makkovik	500	500	400	225			1625	1125	855	
[13]	Marys Harbour Diesel	270	225	225	175	165		1060	790	676	
[14]	McCallum	250	136	136				522	272	202	
[15]	Mud Lake	55	45	45				145	90	74	
[16]	Nain	350	270	270	270	270		1430	1080	913	
[17]	Norman Bay	30	30	30				90	60	51	
[18]	Paradise River	55	55	35				145	90	85	
[19]	Petite Forte	136	136	55				327	191	140	
[20]	Petites	200	90	90				380	180	132	
[21]	Port Hope Simpson	350	225	225	125			925	575	472	
[22]	Postville	225	155	75	75			530	305	291	
[23]	Ramea	1000	1000	568	500	442	426	3936	2936	2509	
[24]	Rencontre East	300	250	136				686	386	243	
[25]	Rigolet	225	165	125	90			605	380	362	
[26]	South East Bight	136	136	55				327	191	143	
[27]	St. Brendans	300	300	250				850	550	354	
[28]	St Lewis	225	220	125	125			695	470	330	
[29]	Westport	250	250	250				750	500	468	
[30]	Williams Harbour	125	125	75				325	200	114	
[31]	Subtotals	8872	7331	5757	3136	1417	426	0 26939	18067	15194	
[32]	No of units	1	2	6	4	1	1	1			
[33]	Rod./St. A.	5000	2000	1000	850	450	400	350	19600	14600	11998
[34]	TOTALS								46539	32667	27192

NEWFOUNDLAND AND LABRADOR HYDRO  
ISOLATED AREA GENERATING PLANT DATA

	[11] ANNUAL ENERGY	[12] S C LOAD FACTOR	[13] FIRM C. F.	[14] EFFIC- IENCY	[15] FUEL INPUT	[16] FUEL COST	[17] FUEL COST	[18] FUEL COST
Source or calculation	GCB2.6 NP4			GCB2.1	IC46	IC46	[18]/[11]	NP1(a)
Units	MWh	pu	pu	KWh/l	Kl	\$/l	\$/KWh	\$(000's)
SYSTEM								
[1] Black Tickle	1259	0.2939	0.2903	3.10	406.13	0.244	0.0787	99.1
[2] Cartwright	3238	0.5015	0.3423	3.50	925.14	0.283	0.0809	261.8
[3] Charlottetown	1136	0.3351	0.3705	3.10	366.45	0.254	0.1448	164.5
[4] Davis Inlet	1451	0.5097	0.3524	2.70	537.41	0.247	0.0915	132.7
[5] Francois	816	0.3463	0.3105	2.80	291.43	0.404	0.1443	117.7
[6] Grey river	663	0.3193	0.2783	3.10	213.87	0.289	0.0932	61.8
[7] Harbour Deep	915	0.3402	0.2560	2.90	315.52	0.238	0.0822	75.2
[8] Hopedale	2356	0.4453	0.3984	3.00	785.33	0.255	0.0850	200.3
[9] La Poile	538	0.3320	0.2718	3.10	173.55	0.289	0.0932	50.2
[10] Little Bay Islands	1630	0.3081	0.2067	3.30	493.94	0.277	0.0839	136.8
[11] l'Anse Au Loup	9807	0.4247	0.4443	3.20	3064.69	0.229	0.0716	701.9
[12] Makkovik	2937	0.3921	0.2980	3.00	979.00	0.242	0.0807	236.9
[13] Marys Harbour Diesel	2643	0.4463	0.3819	3.10	852.58	0.243	0.0665	175.8
[14] McCallum	643	0.3634	0.2699	3.20	200.94	0.289	0.0903	58.1
[15] Mud Lake	192	0.2962	0.2435	2.00	96.00	0.299	0.1495	28.7
[16] Nain	4722	0.5904	0.4991	3.10	1523.23	0.245	0.0790	373.2
[17] Norman Bay	89	0.1992	0.1693	1.90	46.84	0.261	0.2373	21.1
[18] Paradise River	256	0.3438	0.3247	2.20	116.36	0.259	0.1177	30.1
[19] Petite Forte	411	0.3351	0.2456	2.50	164.40	0.289	0.1156	47.5
[20] Petites	346	0.2992	0.2194	2.70	128.15	0.289	0.1070	37.0
[21] Port Hope Simpson	1519	0.3674	0.3016	2.90	523.79	0.303	0.1045	158.7
[22] Postville	1099	0.4311	0.4113	2.80	392.50	0.250	0.0893	98.1
[23] Ramea	8667	0.3943	0.3370	3.50	2476.29	0.218	0.0623	539.8
[24] Rencontre East	825	0.3876	0.2440	3.00	275.00	0.289	0.0963	79.5
[25] Rigolet	1305	0.4115	0.3920	3.00	435.00	0.283	0.0943	123.1
[26] South East Bight	377	0.3010	0.2253	2.70	139.63	0.289	0.1070	40.4
[27] St. Brendans	1151	0.3712	0.2389	3.20	359.69	0.238	0.0744	85.6
[28] St Lewis	1448	0.5009	0.3517	3.10	467.10	0.245	0.0790	114.4
[29] Westport	1432	0.3493	0.3269	3.00	477.33	0.220	0.0733	105.0
[30] Williams Harbour	405	0.4056	0.2312	2.50	162.00	0.249	0.0994	40.2
[31] Subtotals	54276	0.4078	0.3429				0.0810	4395.4
[32] Roddickton/								
[33] St. Anthony	55733	0.5303	0.4358	3.38	16,489	0.210	0.0595	3314.1
[34] TOTALS	110009	<u>0.4618</u>	0.3340				0.0701	7709.5

NEWFOUNDLAND AND LABRADOR HYDRO  
ISOLATED AREA GENERATING PLANT DATA

	Data source Units	[19]	[20]	[21]	[22]	[23]	[24]	[25]
		GROWTH RATE (D)			GROWTH RATE (E)			S. C.
		1993 KW NP4	1997 KW NP4	RATE Note1 pu/yr.	1993 MWh NP4	1997 MWh NP4	RATE Note1 pu/yr	Load Factor 1997 pu
SYSTEM								
[1]	Black Tickle	406	420	1.009	1277	1445	1.031	0.393
[2]	Cartwright	793	897	1.031	3374	3779	1.029	0.481
[3]	Charlottetown	507	610	1.047	1496	1794	1.046	0.336
[4]	Davis Inlet	352	364	1.008	1558	1609	1.008	0.505
[5]	Francois	299	300	1.001	837	842	1.001	0.320
[6]	Grey river	264	274	1.009	689	714	1.009	0.297
[7]	Harbour Deep	272	281	1.008	847	875	1.008	0.355
[8]	Hopedale	573	652	1.033	2280	2595	1.033	0.454
[9]	La Poile	183	188	1.007	554	570	1.007	0.346
[10]	Little Bay Islands	589	589	1.000	1812	1812	1.000	0.351
[11]	l'Anse Au Loup	2538	2716	1.017	10293	10990	1.017	0.462
[12]	Makkovik	596	640	1.018	2430	2585	1.016	0.461
[13]	Marys Harbour Diesel	707	786	1.027	2849	3134	1.024	0.455
[14]	McCallum	198	210	1.015	650	692	1.016	0.376
[15]	Mud Lake	81	83	1.006	210	216	1.007	0.297
[16]	Nain	1046	1118	1.017	4135	4778	1.037	0.488
[17]	Norman Bay	40	42	1.012	96	103	1.018	0.280
[18]	Paradise River	76	76	1.000	234	234	1.000	0.351
[19]	Petite Forte	146	0	0.000	411	0	0.000	0.000
[20]	Petites	124	124	1.000	339	339	1.000	0.312
[21]	Port Hope Simpson	543	625	1.036	1897	2176	1.035	0.397
[22]	Postville	351	380	1.020	1233	1344	1.022	0.404
[23]	Ramea	2227	2775	1.057	7877	8684	1.025	0.357
[24]	Rencontre East	256	263	1.007	873	899	1.007	0.390
[25]	Rigolet	442	481	1.021	1542	1678	1.021	0.398
[26]	South East Bight	152	164	1.019	445	480	1.019	0.334
[27]	St. Brendans	374	390	1.011	1232	1287	1.011	0.377
[28]	St Lewis	399	428	1.018	1563	1667	1.016	0.445
[29]	Westport	485	507	1.011	1480	1548	1.011	0.349
[30]	Williams Harbour	92	94	1.005	365	393	1.019	0.477
[31]	Subtotals	15111	16477	1.022	54878	59262	1.019	0.411
[32]	Roddickton/							
[33]	St. Anthony	11341	12766	1.030	52433	58844	1.029	0.526
[34]	TOTALS	26452	29243	1.025	107311	118106	1.024	0.461

Note 1: Calculated as the compound growth rate from 1993 to 1997.