

1 Q. **Reference: Reliability and Resource Adequacy Study 2022 Update, Volume I, page 8, lines 4-7.**

2 Hydro states: "All inputs in the resource planning process flowchart were completed for the  
3 2022 Update except for Step 'h'."

4 Has Hydro ever performed a study in which all inputs in the flowchart were completed including  
5 Step 'h'? If so, describe the context of the study, any ways in which the implemented process  
6 differed from that depicted in the flowchart, and how the results of the study were used.  
7 Provide the report from this study if one was completed.

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10 A. Since the 2018 "Reliability and Resource Adequacy Study" ("2018 Filing"),<sup>1</sup> Newfoundland and  
11 Labrador Hydro has been unable to use this approach to system planning, largely due to the  
12 unknown rate mitigation plan for Muskrat Falls and now uncertainty due to reliability criteria,  
13 Labrador-Island Link reliability, substantial future growth, and the impact of the proposed Clean  
14 Electricity Standard on resource expansion options.

15 The most recent system planning filing prior to the 2018 Filing was issued in November 2012;<sup>2</sup>  
16 however, it is not evident that an iterative process was followed.

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<sup>1</sup> "Reliability and Resource Adequacy Study," Newfoundland and Labrador Hydro, rev. September 6, 2019 (originally filed November 16, 2018).

<sup>2</sup> "Generation Planning Issues," Newfoundland and Labrador Hydro, November 2012 was filed as Exhibit P-01136 as part of *The Commission of Inquiry Respecting the Muskrat Falls Project* on November 13, 2018, <<https://www.muskratfallsinquiry.ca/files/P-01136.pdf>>.