Q. Reference: Application, Schedule 1, page 6 and Application, Schedule 1, Attachment 1, page 8.

Both BC Hydro and NB Power include an "adder" to the market-based portion of their respective non-firm pricing. Please explain in detail the reasoning for the adders by each utility, including if embedded (or fixed) costs are considered in the application of the adder.

A. In each case the purpose of the adder is to earn a nominal return on the sale of the commodity, rather than simply offering energy as a pass-through of the commodity price. For BC Hydro,<sup>1</sup> the adder is intended to make a contribution to fixed costs to minimize risks to non-participants. Additional considerations are the risk of under-forecasting marginal cost to participants and uncertainty in general.<sup>2</sup> (Note that the adder has two levels and is lower in the Freshet period (when run-of-the-river power is abundant).

For NB Power,<sup>3</sup> the adder is a vehicle for recovering incremental administration costs or, more generally, making a modest contribution to fixed costs arising from the offer or surplus energy. The adder is defined by time period: the on-peak adder is set at 0.9 cents per kWh and the offpeak adder is set at 0.3 cents per kWh. This serves to make the adder closer to a fixed proportion of incremental cost.

<sup>&</sup>lt;sup>1</sup> The British Columbia Hydro and Power Authority ("BC Hydro").

<sup>&</sup>lt;sup>2</sup> "Transmission Service Market Reference Priced Rates Application," British Columbia Hydro and Power Authority, October 31, 2019, pp. 63 and 74.

<sup>&</sup>lt;sup>3</sup> New Brunswick Power Corporation ("NB Power").