Q. In its response to NLH-NP-047, Newfoundland Power provided its native peak demand for the period from 2021 through 2023 forecast.

Please explain the 104.5 MW of load decline observed between the weather normalized peak demand of 1,445.9 MW observed in 2016 and the forecast weather normalized peak demand of 1,341.4 MW in 2023.

A. For the period 2010 to 2020, Newfoundland Power's weather normalized peak demand ("peak demand") has ranged from a low of 1,241.0 MW in the 2010-2011 winter season, to a high of 1,445.9 MW in the 2016-2017 winter season. This represents a range of approximately 205 MW. Newfoundland Power's peak demand forecast of 1,341.4 MW for the 2023-2024 winter season is close to the midpoint of this range.

A peak demand forecast that is lower than the 1,445.9 MW peak experienced in the 2016-2017 winter season can be reasonably expected considering the decline in Newfoundland Power's energy requirements over time.³ The high peak demand experienced during the 2016-2017 winter season occurred when Newfoundland Power's energy requirements were relatively high.⁴ Newfoundland Power's forecast energy requirements in 2023 are more comparable to the 2011 to 2013 period when energy requirements were lower.⁵ The Company's peak demand forecast for the 2023-2024 winter season is also comparable to the peak demand experienced in the 2011 to 2013 period.⁶

Newfoundland Power's peak demand can vary from one year to the next. For example, the peak demand that occurred in the 2016-2017 winter season was approximately 65 MW higher than the peak demand experienced in the previous winter season. Similarly, the peak demand that occurred in the 2016-2017 winter season was approximately 61 MW higher than the peak demand experienced in the following winter

Newfoundland Power's peak demand in the 2020-2021 winter season was 1,299.8 MW. Since it occurred at the onset of COVID-19 public health measures in February of 2021, this winter peak is not included in determining the Company's peak demand forecast.

Newfoundland Power's weather normalized peak demand forecast is 100.3 MW higher than the low end of the range (1,341.4 MW – 1,241.0 MW = 100.4 MW). The Company's weather normalized peak demand forecast is 104.5 MW lower than the high end of the range (1,341.4 MW – 1,445.9 MW = 104.5 MW).

³ See response to Request for Information NLH-NP-084 for an explanation of the factors that are contributing to a decline in the Company's energy sales.

Newfoundland Power's Weather Normalized Produced & Purchased energy requirements in 2016 was 6,295.2 GWh, the second highest recorded by the Company and slightly lower than the all-time high of 6,309.4 GWh experienced in 2015. See Response to Request for Information NLH-NP-082, Attachment A.

Newfoundland Power's Weather Normalized Produced & Purchased energy requirements in 2023 is forecast to be 5,971.5 GWh. Actual Weather Normalized Produced & Purchased energy requirements in 2011, 2012, and 2013 was 5,877.8 GWh, 5,976.1 GWh, and 6,107.1 GWh, respectively.

The peak demand forecast for the 2023-2024 winter season is 1,341.4 MW. The peak demands experienced during the 2011-2012, 2012-2013, and 2013-2014 winter seasons were 1,310.3 MW, 1,360.0 MW, and 1,352.4 MW, respectively.

Newfoundland Power's peak demand in the 2015-2016 winter season was 1,381.2 MW.

1	season. ⁸ A peak demand forecast that is approximately 100 MW lower than a peak
2	demand experienced 7 years prior is not unreasonable.
3	
4	In addition to changes in forecast energy requirements, Newfoundland Power's
5	methodology to forecast peak demand also takes into consideration historical peak
6	demands, including the high peak demand experienced in the 2016-2017 winter season. ⁹
7	This ensures the Company's peak demand forecast accounts for higher peak demands and
8	lower load factors that can occur in a year. 10

Newfoundland Power's peak demand in the 2017-2018 winter season was 1,384.9 MW.

Newfoundland Power uses a 5-year average historical load factor and forecast energy requirements to forecast peak demand. See responses to Requests for Information PUB-NP-053, PUB-NP-109, and NLH-NP-078 regarding Newfoundland Power's peak demand forecast methodology.

¹⁰ See response to Request for Information NLH-NP-082, Attachment A.