

1 Q. Please explain why Hydro has waited until now before initiating the types of studies
2 mentioned in the preamble to GRK-NLH-76 or other planning efforts leading to a
3 new CDM program to replace the one that ended in 2013.

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6 A. As is suggested by this question, Hydro has not waited until now before initiating
7 the types of studies mentioned in the preamble to GRK-NLH-076. Please refer to
8 previously filed responses referenced on page 29 of the December 2014 Liberty
9 Report. Hydro's response to PUB-NLH-433 refers to a previous CDM Potential Study
10 that was completed in 2008. Hydro's response to PUB-NLH-434 references the
11 marginal cost study completed by NERA Economic Consulting in 2006, and Hydro's
12 response to PUB-NLH-437 includes the CDM Five Year Plans for the periods 2008 to
13 2013 and 2012 to 2016.