

1 Q. With reference to the Energy and Capacity Agreement dated July 31, 2012 (Hydro's
2 response to PUB-NLH-220, Attachment 3), does "Stored Energy" as defined at page
3 16 of the Agreement and referenced in section 1.5 of the Agreement include the
4 potential to generate Energy that is represented by an incremental increase in the
5 volume of water stored in any reservoirs on the Island serving hydraulic generation
6 plants owned by Hydro on the Island (e.g. Bay d'Espoir, Cat Arm, etc.)?
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9 A. The Stored Energy as defined in the Energy and Capacity Agreement (ECA) is as
10 follows:

11 "Stored Energy' means the potential to generate Energy that is
12 represented by an incremental increase in the volume of water stored
13 in any reservoirs owned or operated by, or available to Nalcor,
14 including the reservoir associated with the hydroelectric generation
15 facilities at Churchill Falls on the Churchill River in NL;"
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17 There are no restrictions in the definition as to which reservoirs the incremental
18 volume of water can be placed and used to supply the Nova Scotia Block.
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20 At the present time, there is no arrangement for these purposes between Nalcor
21 and Hydro to use any of the generation facilities Hydro owns, operates or has
22 access to through other arrangements. Such arrangements with Nalcor would
23 require a number of terms including the manner in which such incremental storage
24 would be quantified and attributed to the delivery of the Nova Scotia Block on
25 behalf of Nalcor.