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Québec, le 25 avril 2008

Me Véronique Dubois  
Secrétaire  
RÉGIE DE L'ÉNERGIE  
Tour de la Bourse, C.P. 001  
800, Place Victoria, 2<sup>e</sup> étage, bureau 255  
Montréal (Québec) H4Z 1A2

OBJET: Demande d'approbation du Plan d'approvisionnement  
2008-2017 du Distributeur  
Votre référence : R-3648-2007 phase 1  
Notre dossier No : 1038998

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Chère Consoeur,


Suite à la vôtre du 24 avril 2008, nous joignons en huit exemplaires le rapport de notre expert Robert D. Knecht concernant la phase 1 de ce dossier.

Nos témoins seront : Robert D. Knecht, expert  
Pierre Vézina, CIFQ  
Luc Boulanger, AQCIE;

Temps de présentation : 15 minutes;

Contre-interrogatoire du Distributeur : N/A.

Veuillez agréer, chère consœur, l'expression de nos sentiments les meilleurs.

  
**Stein Monast, S.E.N.C.R.L.**  
Procureurs de L'AQCIE ET DU CIFQ

PP/ Im  
c.c. par courriel seulement :  
Hydro-Québec –Me Yves Fréchette  
Les intervenants

BEFORE THE RÉGIE DE L'ÉNERGIE

IEC

IN THE MATTER OF:  
HYDRO QUÉBEC DISTRIBUTION

Demande d'approbation du Plan  
d'approvisionnement 2008-2017 du  
Distributeur

DOSSIER R-3648-2007

26 April 2008

prepared on behalf of:

l'Association québécoise des consommateurs  
industriels d'électricité (AQCIÉ)

Conseil de l'industrie forestière du Québec (CIFQ)

prepared evidence of:

Robert D. Knecht

Industrial Economics, Incorporated

2067 Massachusetts Avenue

Cambridge, MA 02140

INTRODUCTION 1 My name is Robert D. Knecht. I am a Principal and the Treasurer of Industrial  
2 Economics, Incorporated (“IEc”), a consulting firm located at 2067 Massachusetts  
3 Avenue, Cambridge, MA 02140. As part of my consulting practice, I prepare analyses  
4 and expert testimony in the field of regulatory economics. In Canada, I have submitted  
5 expert evidence in regulatory proceedings in Québec, Ontario, Alberta, New Brunswick,  
6 Nova Scotia, Manitoba, and Prince Edward Island. In matters regarding Hydro Québec  
7 Distribution (“HQD”), I have submitted evidence before the Régie on a number of  
8 occasions between 2001 and the present.

9 I obtained a B.S. degree in Economics from the Massachusetts Institute of Technology in  
10 1978, and a M.S. degree in Management from the Sloan School of Management at M.I.T.  
11 in 1982, with concentrations in applied economics and finance. My *curriculum vitae* and  
12 a schedule of my expert evidence presented to regulatory tribunals are attached as Exhibit  
13 RDK-1.

14 I was retained by l'Association québécoise des consommateurs industriels d'électricité  
15 (“AQCIE”) and the Conseil de l'industrie forestière du Québec (“CIFQ”) to evaluate  
16 HQD’s proposed modifications to its contracts with Hydro Québec Production for base  
17 and cyclable electricity supply.

18 At this writing, I believe that the conclusions in this evidence are final, although my  
19 analysis and review of information requests is continuing. If this ongoing analysis  
20 requires me to modify my primary conclusions and recommendations or to modify the  
21 substance of my analysis, I will notify the Régie and the other parties promptly.

CONTEXT 22 Hydro Québec Distribution (“HQD”) is appearing (once again) before the Régie having  
23 contracted for electric generation supplies in excess of its post-patrimonial load in the  
24 near term, now forecasted as the 2008 to 2011 period. HQD explains that the reduction in  
25 its forecast for domestic load results from three factors. First is the unanticipated  
26 weakness in the industrial sector, particularly in the pulp and paper industry. Second is  
27 the increases in energy efficiency targets, and third is a technical adjustment to “normal  
28 temperature” assumptions.

29 Unfortunately, my clients at AQCIE and CIFQ can confirm the problems faced by the  
30 pulp and paper industry, as well as other industrial sectors. Despite strong worldwide  
31 commodity prices, the Québec forest products industry is faced by a number of  
32 significant competitive problems, including economic access to fiber and the strength of  
33 the Canadian dollar. While electricity rates are far from the only problem facing Québec  
34 industry, the unfavorable regulatory climate for industrial electricity supply is  
35 contributing to this weakness. As I have observed in previous evidence, high and rising  
36 costs associated with the cross-subsidization of other rate classes by the industrial class,  
37 and the extremely unfavorable cost assignment methods adopted for post-patrimonial  
38 loads, are not policies that are conducive to corporate decisions in favor of modernization

1 investment in industrial facilities. That problem, however, is a matter for another  
2 proceeding. The aim of this proceeding is to make the best of this bad situation.

3 To address the near-term over-supply, HQD offers modifications to its two supply  
4 contracts with Hydro Québec Production (“HQP”).<sup>1</sup> In summary, both of the proposed  
5 modifications would allow HQD to defer delivery of the supplies under these contracts  
6 from the 2008 to 2011 period to the 2012 to 2020 timeframe.

7 HQD justifies its proposal with an economic analysis that compares the impact of the  
8 proposed contract modifications with (what I assume to be) its next best scenario, namely  
9 a resale of the near-term excess supplies on spot markets. (See HQD-1, Document 5,  
10 Table 2 page 12 of 21.) In this evidence, I review HQD’s economic methodology and its  
11 key assumptions for reasonableness. I also discuss other economic considerations that  
12 impact on this decision.

ECONOMIC ANALYSIS  
OF HQD’S  
PROPOSAL

13 From my perspective, the options that HQD has to address its oversupply problem are the  
14 following three generic approaches:

- 15 1. **Reduce:** First, HQD could simply not take the excess supplies. To follow  
16 this strategy, HQD would simply reduce its purchases of the highest  
17 variable cost supplies in its post-patrimonial supply portfolio. Of course,  
18 HQD would remain obligated to make any fixed or demand payments that  
19 are contractually required associated with those supplies.
- 20 2. **Resell:** Second, HQD could take all of its contracted supplies, and re-sell  
21 those supplies to third parties in the export markets. This approach will be  
22 economically more attractive than the first option only if the net sale price  
23 for the supplies is greater than the variable cost of purchasing those  
24 supplies.
- 25 3. **Renegotiate:** Third, HQD could attempt to renegotiate contracts with its  
26 suppliers. This approach may be viable, particularly if HQD’s suppliers  
27 perceive greater value in not selling to HQD if the contract renegotiation  
28 precludes HQD from becoming another competitor in the export markets.

29 In its presentation, HQD does not directly address the first option. However, as the TCE  
30 supplies are already constrained, I am not aware of any other post-patrimonial supplies  
31 that HQD could draw down. Moreover, because the variable costs of the HQP supplies  
32 are likely to be lower than the market prices that HQD could achieve by resale, I  
33 conclude that analysis of the “Reduce” option is not necessary.

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<sup>1</sup> The proposed modifications to the 350 MW firm baseload supply contract are reported in Exhibit HQD-1, Document 3, and the modifications to the 250 MW “cyclable” supply contract are reported in HQD-1, Document 4.

1 What HQD does analyze is a comparison of the “Resell” and the “Renegotiate” options.<sup>2</sup>  
2 Under the Resell option, HQD assesses the net gain that it could achieve by reselling  
3 some 9.0 TWh of excess electricity supplies between 2008 and 2011. The net price that  
4 HQD assumes that it could achieve from reselling the energy is based on the forward  
5 market prices for NYISO Zone A energy supplies, adjusted for historical locational  
6 differentials between Zone M and Zone A, transmission losses, a \$5 per MWh market  
7 adjustment and transactions charges.<sup>3</sup> The net resell price calculated by HQD works out  
8 to between \$57 and \$60 per MWh. Thus, the resale price is slightly higher than the full  
9 contract cost of the HQP supplies, which HQD evaluates at \$50 and \$53 per MWh in  
10 2008 for the base and cyclable contracts respectively.

11 In effect, the Resell scenario will result in slightly lower rates for all ratepayers in the  
12 2008 to 2011 period than what the rates would be if HQD had not contracted with HQP  
13 for this supply, because HQD makes a modest profit by reselling that power.

14 As the alternative to “Resell,” HQD offers a “Renegotiate” option. Needless to say, there  
15 are a wide variety of possible ways that the contracts with HQP might be renegotiated,  
16 and I do not know what the options were that HQD and HQP considered, nor why they  
17 were rejected. However, the economic considerations of the option that HQD has put on  
18 the table are as follows.

19 Under the modified contracts, HQD is able to avoid the full contract costs of an estimated  
20 9.0 TWh of HQP supplies in the 2008 to 2011 period. The contract modifications also  
21 allow HQD to take these supplies at a later date at the contract price, adjusted upward by  
22 a contractually-specified 2.0 percent annual adjustment. In effect, these deferred supplies  
23 are expected to displace HQD’s need for additional post-patrimonial supplies in the 2013  
24 to 2020 period, assuming that HQD’s forecast load growth re-materializes.

25 In its economic analysis, HQD determines the avoided cost of these supplies based on the  
26 fully loaded cost of its wind contracts, which is the value that HQD uses for long-run  
27 avoided cost in other calculations. HQD assesses that value at a 2008 dollar price of  
28 about \$85 per MWh. In effect, HQD’s analysis assumes that it will be able to use \$50 per  
29 hour power as a substitute for \$85 per hour power, as measured in 2008 constant dollars.  
30 Thus, rather than resell the \$50 per MWh power in 2008 to 2011 at about \$57 per MWh,  
31 HQD argues that the contract modifications allow it to use that power as a substitute for  
32 \$85 per MWh power in 2013 to 2017.

33 Finally, HQD must determine how to compare the benefits of near term resale with the  
34 benefits of longer-term avoided costs. HQD’s analysis makes that comparison on a total

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<sup>2</sup> HQD’s analysis is reported in HQD-I, Document 5, Table 2.

<sup>3</sup> HQD’s analysis is shown in HQD-I, Document 5, Table 1A. The basis for the \$5 per MWh adjustment is not explicitly stated. However, based on my review of Docket No. R-3649-2007 HQD-I, Document 1, it is my understanding that this adjustment is based on HQD’s actual experience with tenders for export, reflecting limits on interconnection capacity and the depressing impact that additional exports have on locational prices.

1 “current dollar” basis and on a net present value basis. The results of HQD’s analysis are  
2 shown in the table below (which is the same as HQD’s Table 4 in HQD-1, Document 5.)

TABLE IEC-1 SUMMARY OF HQD ECONOMIC ANALYSIS (\$ MILLIONS)			
	Resell Scenario (No Deferral)	Renegotiate Scenario (Deferral)	Difference
Total Current Dollars	\$1,469	\$1,171	\$298
Net Present Value	\$1,110	\$934	\$176
Source: HQD-1, Document 5, Tables 2 and 4			

3 Not surprisingly, HQD’s analysis shows that the benefits of \$85 per MWh avoided costs  
4 are higher than the benefits of \$57 resale power, even on a net present value basis. In  
5 particular, HQD’s analysis shows that, on a net present value basis, the Renegotiate  
6 scenario is some \$176 million more attractive than the Resell scenario.

7 However, in evaluating HQD’s analysis, the questions that should be asked are:

- 8 • Are the excess supply volumes reasonably accurate? What are the  
9 implications of variations in the amount of deferred load and the recovery  
10 period?
- 11 • Are the net prices earned from resale reasonable, or has HQD been unduly  
12 conservative?
- 13 • Is the avoided cost assumption reasonable? Is wind power the relevant  
14 measure of avoided cost, or would conventional power supplies be a more  
15 reasonable approach?
- 16 • Is a nominal dollar comparison useful? Is the discount rate used for the net  
17 present value analysis reasonable?

18 Regarding these questions, I reviewed the assumptions that underpin HQD’s analysis, and  
19 I simulated a simple version of HQD’s table to test the sensitivity of that analysis to  
20 alternative questions. My sensitivity analysis, however, is not a traditional sensitivity  
21 analysis in which I consider different assumptions both above and below the values used  
22 by HQD. In my analysis, I simply modify the parameter in a way that would make  
23 HQD’s “Renegotiate” scenario less attractive. In effect, my analysis shows how likely  
24 HQD would be to reach a different decision based on a modification of some specific  
25 assumptions.

26 I have the following observations about that sensitivity analysis.

27 First, the volume deferred is not a significant factor in the relative advantage of the two  
28 scenarios. Higher deferred volumes generally improve the advantage of the

1 "Renegotiate" scenario, because more volumes can offset the higher avoided costs.  
2 Lower deferred volumes would reduce the dollar value of the savings from the  
3 Renegotiate scenario, but the large price differential between the resale price and the  
4 avoided cost maintains the economic attractiveness of the Renegotiate scenario. Pushing  
5 back the timing of the re-supply of deferred volumes to later in the 2012 to 2020 period  
6 has an impact on the net present value analysis, but the impact is small.

7 Second, in light of HQD's recent experience with resale, I expect that HQD should have a  
8 sound basis for what it can net from a resale of energy into neighboring markets. I also  
9 note that the actual average LMP for the NYISO HQ zone for the past year was about \$61  
10 per MWh, which is at least \$5 per MWh lower than HQD's zone M assumption for 2008.  
11 In effect, the actual LMP is similar to HQD's assumption net of the \$5 per MWh price  
12 adjustment.

13 To test the sensitivity of HQD's analysis to this price assumption, I re-simulated the HQD  
14 model increasing the net value by \$10 per MWh. I note that this is an extraordinarily  
15 optimistic assumption. In fact, if electricity prices were that much higher in the 2008 to  
16 2011 period, it would likely be due to an increases in fuel prices. However, such higher  
17 fuel prices would also likely manifest themselves in higher avoided costs in the 2013 to  
18 2017 period, thereby increasing the relative attractiveness of the Renegotiate scenario.

19 Third, HQD's use of the cost of new wind power could be questioned as whether it is a  
20 reasonable assumption for the avoided cost of new supplies in the 2013 to 2017 period.  
21 Wind power costs may reflect values associated with renewable energy credits ("RECs")  
22 that implicitly overstate the cost of conventional power supplies. However, I generally  
23 agree with HQD that there are benefits for HQD to be consistent in all of its analyses  
24 (notably the PGEÉ program) when evaluating the long run avoided cost of new capacity  
25 options. Moreover, based on current natural gas prices and 2007 US DOE/EIA estimates  
26 of the cost of new generating capacity, I believe that it is unlikely that new gas-fired  
27 capacity could be placed in service at a cost of less than \$80 or \$85 per MWh (in 2008  
28 dollars). Other traditional supply sources such as coal and nuclear face significant  
29 construction lead times, construction cost uncertainties and major regulatory hurdles. As  
30 such, I deem that HQD's assumption of a firm power price of \$85 per MWh (2008\$) is  
31 not unreasonable. If anything, an economic case can probably be made that new power  
32 supplies would be more costly than \$85 per MWh in the latter part of the next decade.  
33 However, to test the sensitivity of HQD's analysis, I constructed a scenario based on \$75  
34 per MWh avoided cost.

35 Fourth, I note that HQD makes a comparison both on a total nominal dollar basis and on a  
36 net present value basis. From my perspective, the nominal dollar comparison is not  
37 meaningful. The effect of deferring the HQP load is to increase near-term rates above  
38 what they would be if HQD were to simply resell that power. This relative increase may  
39 manifest itself in other rate increase considerations, such as how long certain other costs  
40 incurred by HQD should be deferred, particularly those that are subject to interest  
41 charges. For example, the lower prices associated with resale of power may allow HQD  
42 to accelerate recovery of deferred transmission costs, thereby reducing accumulated

1 interest charges on those costs. Thus, it is important to recognize the “time value of  
 2 money” in this analysis. Moreover, the appropriate cost of capital to use should be that  
 3 used by HQD as a carrying cost on its deferred costs. HQD’s analysis appears to use a  
 4 discount rate of approximately 6.4 percent. It is my understanding that this level is  
 5 approximately equal to the carrying charge on HQD’s deferred costs. As such, I consider  
 6 it to be a reasonable value to use for this analysis. However, increasing that rate has the  
 7 effect of reducing the relative attractiveness of the Renegotiate scenario, because the  
 8 value of the avoided costs is reduced. It may be argued that the cost of capital for  
 9 ratepayers is higher than 6.4 percent, and that therefore a higher discount rate is  
 10 appropriate. Therefore, as a sensitivity test, I applied a discount rate of 8 percent.

11 Finally, in what is probably an excess of caution, I constructed a “worst case” scenario,  
 12 which consists of a combination of all of the sensitivity analyses described above. As  
 13 noted earlier, I consider it extremely unlikely that near-term resale prices would be higher  
 14 than HQD expects *and* longer-term avoided costs would be lower. Nevertheless, for  
 15 demonstration purposes, both of those assumptions are factored into the “worst case”  
 16 scenario.

17 The table below reports the net present value analysis of all of these scenarios:

TABLE IEC-2 SENSITIVITY ANALYSIS OF HQD SCENARIO 2008 NET PRESENT VALUES (\$MM)			
	Resell Scenario (No Deferral)	Renegotiate Scenario (Deferral)	Difference
HQD Analysis	\$1,110	\$934	\$176
Higher Resale Prices: \$10 per MWh over HQD	\$1,028	\$934	\$ 95
Lower Avoided Cost: \$10 per MWh below HQD	\$1,045	\$934	\$112
Higher Discount Rate: 8.0% versus HQD 6.4%	\$1,045	\$890	\$156
“Worst Case”	\$906	\$890	\$ 17
Source: HQD-1, Document 5, Tables 2 and 4; Exhibit IEC-2			

18 Thus, even in the extremely unlikely “worst case” scenario, the Renegotiate proposal is  
 19 economically superior to a Resale option.

20 Obviously, alternative scenarios can be envisioned in which the economic benefit of the  
 21 Renegotiate option is even greater than that calculated by HQD. In particular, HQD  
 22 could easily experience lower resale prices or higher avoided costs. However, I have not  
 23 analyzed these as they would simply confirm that the Renegotiate strategy is superior.

1 Thus, this sensitivity analysis demonstrates that HQD's analysis is quite robust in that the  
2 conclusion is the same under a wide variety of different assumptions.

3 *Flexibility*

4 In my view, the contract modifications provide HQD with good flexibility in allowing it  
5 to adjust supplies to meet its actual loads, both in terms of the deferral of loads and in  
6 terms of the re-supply of the deferred loads. With respect to the former, HQD is  
7 permitted to make adjustments on a 50 MW block basis, rather than on entire contracted  
8 amounts. Moreover, HQD is permitted to make adjustments to the load that it needs on  
9 either a calendar quarter basis or a half-year basis (for the summer months) with very  
10 short notice. The notice period is only one month for most periods, with a 2.5 month  
11 notice requirement for winter supplies. Also, it is important to recognize that HQD can  
12 retain the ability to acquire supplies under these contracts during the peak winter season,  
13 without necessarily needing to take the supplies during the off-peak seasons. This  
14 flexibility may allow HQD to avoid the near-term need to contract for peaking supplies.  
15 (In light of the value of this peaking capability, it is somewhat surprising that the contract  
16 does not contain a significant demand charge, however.)

17 In addition, with respect to the re-supply period, HQD retains significant flexibility in  
18 determining in which year it will need that power. This makes the re-supply contract  
19 significantly more attractive to HQD than a baseload supply contract, because HQD need  
20 only invoke the re-supply when, and to the extent, it needs the power to meet demand.  
21 Moreover, while the contract modifications require that HQD take the load on a "flat"  
22 basis over the year, this is likely to be more attractive to HQD than the load pattern for  
23 the deferred power. For example, HQD indicates that it expects that it will not defer  
24 power during the peak winter months, but will defer during off-peak months. (See Régie  
25 IR 5.1.) Because that power will be re-supplied on a flat basis, HQD will have  
26 effectively been able to translate some off-peak season power to on-peak season power.

27 *Speculation*

28 The modifications to the contracts with HQP specifically preclude HQD from using HQP  
29 supplies for speculative resale. I do not see a particular disadvantage to this restriction.  
30 HQD is not in the business of selling power, and it likely does not have the internal  
31 capabilities to do so effectively in modern, complex electricity markets. Moreover, it is  
32 reasonable for HQP to want to better manage the competitive environment by keeping an  
33 affiliated competitor (who might depress prices) out of the market, thereby maximizing  
34 the value of Hydro Québec's generation resources for all Québec citizens. As long as  
35 HQD retains the ability to balance its hourly and daily requirements through spot sales,  
36 there is no significant value in it retaining the ability to speculate in external markets.

37 *Risk Mitigation*

38 Because the replacement power is supplied at a fixed price (adjusted only for 2 percent  
39 inflation), the risks of variation in other replacement cost options are reduced. Under the

1 “Resell” scenario, domestic ratepayers are subject to the risks associated with market  
2 price fluctuations both on the sale price and on the future avoided costs. Moreover, were  
3 HQD to enter into a contract now with a different supplier for energy in the 2013 to 2017  
4 timeframe, particularly with the delivery flexibility afforded by the modifications to the  
5 contract, such a supplier would likely charge a risk premium above forward market prices  
6 for that fixed price guarantee over the whole period. Thus, the Renegotiate scenario  
7 exposes domestic ratepayers to lower risk, as well as to lower costs.

#### 8 *End Game*

9 In the event that HQD’s load growth is insufficient to need the deferred HQP volumes  
10 any time between 2013 and 2020, the end game is not as clear as I might prefer.  
11 Paragraph 2.2.8 of the modification agreements specifies that HQP has the option to buy  
12 back any unused deferred energy at 94.8 percent of the NYISO Zone M price net of costs.  
13 It is not clear at this writing what will happen if HQP does not exercise that option, and  
14 HQD is unable to use the deferred energy for domestic supply. HQD indicates only that  
15 it will address this problem in the future if it becomes necessary. (See Régie IR 4.1.)

#### CONCLUSION

16 Based on this analysis, I recommend that the Régie accept HQD’s proposed  
17 modifications to its supply contracts with HQP. This approach is superior to a Resale  
18 strategy in that it:

- 19 • Is expected to produce lower rates over the longer-term for HQD  
20 ratepayers;
- 21 • Provides significant supply flexibility to HQD for meeting the needs of  
22 load growth in the 2013 to 2020 time period;
- 23 • Reduces risk, in that it relies more on fixed prices and less on varying  
24 market prices;
- 25 • Allows HQD to concentrate on its primary function, providing service to  
26 domestic ratepayers, and limits its involvement in areas where it has little  
27 expertise.

IEc

EXHIBIT IEc-1

*CURRICULUM VITAE AND  
EXPERT TESTIMONY SCHEDULE  
OF  
ROBERT D. KNECHT*

ROBERT D. KNECHT  
INDUSTRIAL ECONOMICS, INCORPORATED    EXPERT TESTIMONY SUBMITTED IN REGULATORY PROCEEDINGS -- PAST 5 YEARS

DOCKET #	REGULATOR	UTILITY	DATE	CLIENT	TOPICS
R-2008-2012502	Pennsylvania Public Utility Commission	National Fuel Gas Distribution Company	March 2008	Pennsylvania Office of Small Business Advocate	Transportation and sales customer rate design, design day forecasts.
R-2008-2013026	Pennsylvania Public Utility Commission	T. W. Phillips Gas and Oil Company	March 2008	Pennsylvania Office of Small Business Advocate	Rate design treatment of capacity release revenues
P-00072342	Pennsylvania Public Utility Commission	West Penn Power d/b/a Allegheny Power	February 2008	Pennsylvania Office of Small Business Advocate	Default service electricity procurement, rate design, reconciliation.
2007-004	New Brunswick Board of Commissioners of Public Utilities	New Brunswick Power Distribution and Customer Service Corporation	November 2007	New Brunswick Public Intervenor	Cost allocation, revenue allocation, rate design.
R-3644-2007	Régie de l'Énergie, Québec	Hydro Québec Distribution	October 2007	AQCIE/CIFQ	Cost allocation, revenue allocation, rate design.
P-00072305	Pennsylvania Public Utility Commission	Pennsylvania Power Corporation	July 2007	Pennsylvania Office of Small Business Advocate	Default electric service procurement.
R-00072334	Pennsylvania Public Utility Commission	UGI Penn Natural Gas, Inc.	July 2007	Pennsylvania Office of Small Business Advocate	Asset management arrangement, gas procurement.
R-00072333	Pennsylvania Public Utility Commission	PPL Gas Utilities Corporation	July 2007	Pennsylvania Office of Small Business Advocate	Design day forecasting, gas procurement.
R-00072155	Pennsylvania Public Utility Commission	PPL Electric Utilities Corporation	July 2007	Pennsylvania Office of Small Business Advocate	Cost allocation, revenue allocation, rate design, energy efficiency.
R-00049255 (Remand)	Pennsylvania Public Utility Commission	PPL Electric Utilities Corporation	May 2007	Pennsylvania Office of Small Business Advocate	Revenue allocation
R-00072175	Pennsylvania Public Utility Commission	Columbia Gas of Pennsylvania, Inc.	May 2007	Pennsylvania Office of Small Business Advocate	Gas procurement.
R-00072110	Pennsylvania Public Utility Commission	Philadelphia Gas Works	April 2007	Pennsylvania Office of Small Business Advocate	Gas procurement, margin sharing mechanisms.

## INDUSTRIAL ECONOMICS, INCORPORATED EXPERT TESTIMONY SUBMITTED IN REGULATORY PROCEEDINGS -- PAST 5 YEARS

DOCKET #	REGULATOR	UTILITY	DATE	CLIENT	TOPICS
R-00061931	Pennsylvania Public Utility Commission	Philadelphia Gas Works	April 2007	Pennsylvania Office of Small Business Advocate	Cost allocation, revenue allocation, retail gas competition
P-00072245	Pennsylvania Public Utility Commission	Pike County Light & Power Company	March 2007	Pennsylvania Office of Small Business Advocate	Default service procurement, rate design
R-00072043	Pennsylvania Public Utility Commission	National Fuel Gas Distribution Company	March 2007	Pennsylvania Office of Small Business Advocate	Design day requirements
C-20065942	Pennsylvania Public Utility Commission	Pike County Light & Power Company	November 2006	Pennsylvania Office of Small Business Advocate	Wholesale power procurement by provider of last resort
R-3610-2006	Régie de l'Énergie, Québec	Hydro Québec Distribution	November 2006	AQCIE/CIFQ	Post-patrimonial generation cost allocation; cross-subsidization; rate design
P-00052188	Pennsylvania Public Utility Commission	Pennsylvania Power Company	September 2006	Pennsylvania Office of Small Business Advocate	Affidavit: POLR rates, wholesale to retail.
R-00061493	Pennsylvania Public Utility Commission	National Fuel Gas Distribution Corporation	September 2006	Pennsylvania Office of Small Business Advocate	Rate of return, load forecasting, cost allocation, revenue allocation, rate design, revenue decoupling.
R-00061398	Pennsylvania Public Utility Commission	PPL Gas Utilities Corporation	August 2006	Pennsylvania Office of Small Business Advocate	Cost allocation, revenue allocation, rate design
R-00061365	Pennsylvania Public Utility Commission	PG Energy/Southern Union Company	July 2006	Pennsylvania Office of Small Business Advocate	Merger savings, cost allocation, revenue allocation, rate design.
R-00061519	Pennsylvania Public Utility Commission	PPL Gas Utilities Corporation	July 2006	Pennsylvania Office of Small Business Advocate	Design day weather and throughput forecasts; gas supply hedging.
R-00061518	Pennsylvania Public Utility Commission	PG Energy/Southern Union Company	July 2006	Pennsylvania Office of Small Business Advocate	Design day weather and throughput forecasts; gas supply hedging.
A-125146	Pennsylvania Public Utility Commission	UGI Utilities, Inc., Southern Union Company	June 2006	Pennsylvania Office of Small Business Advocate	Public benefits of proposed sale of PG Energy to UGI; asset management agreement.
R-00061355	Pennsylvania Public Utility Commission	Columbia Gas of Pennsylvania	May 2006	Pennsylvania Office of Small Business Advocate	Gas supply and hedging plan; procedural issues
R-00061296	Pennsylvania Public Utility Commission	Philadelphia Gas Works	April 2006	Pennsylvania Office of Small Business Advocate	Gas procurement and procedural issues.

**ROBERT D. KNECHT**

Robert D. Knecht specializes in the practical application of economics, finance and management theory to issues facing public and private sector clients. Mr. Knecht has more than twenty years of consulting experience, focusing primarily on the energy, metals, and mining industries. He has consulted to industry, law firms, and government clients, both in the U.S. and internationally. He has participated in strategic and business planning studies, project evaluations, litigation and regulatory proceedings and policy analyses. His practice currently focuses primarily on utility regulation, and he has provided analysis and expert testimony in numerous U.S. and Canadian jurisdictions. In addition, as Treasurer of IEc since 1995, Mr. Knecht is responsible for the firm's accounting, finance and tax planning, as well as administration of the firm's retirement plans. Mr. Knecht's consulting assignments include the following projects:

- For the Pennsylvania Office of Small Business Advocate, Mr. Knecht provides analysis and expert testimony in industry restructuring, base rates and purchased energy cost proceedings involving electric, steam and natural gas distribution utilities. Mr. Knecht has analyzed the economics and financial issues of electric industry restructuring, stranded cost determination, fair rate of return, claimed utility expenses, cost allocation methods and rate design issues.
- For independent power producers and industrial customers in Alberta, Mr. Knecht has provided analysis and expert testimony in a variety of electric industry proceedings, including industry restructuring, cost unbundling, stranded cost recovery, transmission rate design, cost allocation and rate design.
- For industrial customers in Québec, Mr. Knecht has prepared economic analysis and expert testimony in regulatory proceedings regarding cost allocation, compliance with legislative requirements for cross-subsidization, and rate design.
- As part of international teams of experts, Mr. Knecht has prepared the economic and financial analysis for industry restructuring studies involving the steel and iron ore industries in Venezuela, Poland, and Nigeria.
- For the U.S. Department of Justice and for several private sector clients, Mr. Knecht has prepared analyses of economic damages in a variety of litigation matters, including ERISA discrimination, breach of contract, fraudulent conveyance, natural resource damages and anti-trust cases.
- Mr. Knecht participates in numerous projects with colleagues at IEc preparing economic and environmental analyses associated with energy and utility industries for the U.S. Environmental Protection Agency.

Mr. Knecht holds a M.S. in Management from the Sloan School of Management at M.I.T., with concentrations in applied economics and finance. He also holds a B.S. in Economics from M.I.T. Prior to joining Industrial Economics as a principal in 1989, Mr. Knecht worked for seven years as an economic and management consultant at Marshall Bartlett, Incorporated. He also worked for two years as an economist in the Energy Group of Data Resources, Incorporated.

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## INDUSTRIAL ECONOMICS, INCORPORATED EXPERT TESTIMONY SUBMITTED IN REGULATORY PROCEEDINGS -- PAST 5 YEARS

DOCKET #	REGULATOR	UTILITY	DATE	CLIENT	TOPICS
R-00061246	Pennsylvania Public Utility Commission	National Fuel Gas Distribution	March 2006	Pennsylvania Office of Small Business Advocate	Gas procurement; unaccounted for gas retention rates
2005-002 Refiling	New Brunswick Board of Commissioners of Public Utilities	New Brunswick Power Distribution and Customer Service Company	February 2006	New Brunswick Public Intervenor	Cost allocation, rate design
P-00052188	Pennsylvania Public Utility Commission	Pennsylvania Power Company	December 2005	Pennsylvania Office of Small Business Advocate	Cost allocation and rate design for POLR supplies.
R-3579-2005	Régie de l'Énergie, Québec	Hydro Québec Distribution	November 2005	AQCIE/CIFQ	Generation cost allocation; cross-subsidization; revenue allocation
2005-002	New Brunswick Board of Commissioners of Public Utilities	New Brunswick Power Distribution and Customer Service Company	August 2005	New Brunswick Public Intervenor	Cost allocation, rate design
R-00050538	Pennsylvania Public Utility Commission	PG Energy	July 2005	Pennsylvania Office of Small Business Advocate	Gas procurement diversification
R-00050540	Pennsylvania Public Utility Commission	PPL Gas Utilities Corporation	July 2005	Pennsylvania Office of Small Business Advocate	Gas procurement, hedging, retention rates, sharing mechanism
R-00050340	Pennsylvania Public Utility Commission	Columbia Gas of Pennsylvania	May 2005	Pennsylvania Office of Small Business Advocate	Gas procurement, hedging and diversification.
R-3563-2005	Régie de l'Énergie, Québec	Hydro Québec Distribution	April 2005	AQCIE/CIFQ	Generation cost allocation; industrial demand response
R-00050264	Pennsylvania Public Utility Commission	Philadelphia Gas Works	April 2005	Pennsylvania Office of Small Business Advocate	Gas procurement, risk hedging, financing costs in the gas cost rate.
R-00050216	Pennsylvania Public Utility Commission	National Fuel Gas Distribution	March 2005	Pennsylvania Office of Small Business Advocate	Gas supply procurement and forward pricing policies.
EB-2004-0542	Ontario Energy Board	Union Gas Limited	March 2005	Tribute Resources Inc.	Cost allocation and rate design for service to embedded storage pools.
R-00049884	Pennsylvania Public Utility Commission	Pike County Light and Power (Gas Service)	January 2005	Pennsylvania Office of Small Business Advocate	Fair rate of return, cost allocation, class revenue assignment.
R-00049656	Pennsylvania Public Utility Commission	National Fuel Gas Distribution	December 2004	Pennsylvania Office of Small Business Advocate	Fair rate of return, uncollectibles costs, automatic rate adjustments, cost allocation, rate design.
R-3541-2004	Régie de l'Énergie, Québec	Hydro Québec Distribution	November 2004	AQCIE, CIFQ	Allocation of post-patrimonial generation costs.



ROBERT D. KNECHT

INDUSTRIAL ECONOMICS, INCORPORATED EXPERT TESTIMONY SUBMITTED IN REGULATORY PROCEEDINGS -- PAST 5 YEARS

DOCKET #	REGULATOR	UTILITY	DATE	CLIENT	TOPICS
C-20031302	Pennsylvania Public Utility Commission	Columbia Gas of Pennsylvania	July 2004	Pennsylvania Office of Small Business Advocate	Customer assistance program funding and cost allocation.
R-049255	Pennsylvania Public Utility Commission	PPL Electric Utilities Corporation	June 2004	Pennsylvania Office of Small Business Advocate	Transmission and distribution cost allocation, rate design, automatic distribution increases.
P-042090 et al.	Pennsylvania Public Utility Commission	Philadelphia Gas Works	June 2004	Pennsylvania Office of Small Business Advocate	Collections and universal service cost issues.
RP-2003-0203	Ontario Energy Board	Enbridge Gas Distribution	May 2004	Vulnerable Energy Consumers Coalition et al.	Cost allocation, rate design for pipeline and storage costs
R-049157 P-042090	Pennsylvania Public Utility Commission	Philadelphia Gas Works	April 2004	Pennsylvania Office of Small Business Advocate	Cash receipts reconciliation clause
R-049108	Pennsylvania Public Utility Commission	National Fuel Gas Distribution	March 2004	Pennsylvania Office of Small Business Advocate	Uncollectible cost responsibility for standby charges
Application 1306819	Alberta Energy and Utilities Board	ENMAX Power Corporation	January 2004	Calgary Industrial Group Calgary Building Owners	T&D cost allocation, rate design, ratepayer equity funding
R-3492-2002 Phase 2	Régie de l'Énergie, Québec	Hydro Québec Distribution	November 2003	AQCIE, CIFQ	Rate policy, cross-subsidization
R-038168	Pennsylvania Public Utility Commission	National Fuel Gas Distribution	July 2003	Pennsylvania Office of Small Business Advocate	Cost allocation, deficiency assignment, rate design, pension cost reconciliation, rate of return
R-3492-2002 Phase 1	Régie de l'Énergie, Québec	Hydro Québec Distribution	January 2003	AQCIE, AIFQ	Cost allocation; maintenance of historical cross-subsidization

April 2008

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IEc

EXHIBIT IEc-2

*SENSITIVITY ANALYSIS  
OF  
HQD ECONOMIC ANALYSIS*

AQCC/CIQ ECONOMIC ANALYSIS OF CONTRACT MODIFICATIONS												
SCENARIO: Replication of HQD-1, Document 5, Table 2												
	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017		
<b>Scenario With Load Deferral</b>												
HQP Contract TWh	5.3	5.3	5.3	5.3								
Base TWh	3.1	3.1	3.1	3.1								
Cycle TWh	2.2	2.2	2.2	2.2								
Total TWh Deferred	2.7	0.6	2.9	2.8	-	-	-	-	-	-	-	-
Base TWh Deferred	2.0	0.6	2.9	2.8	-	-	-	-	-	-	-	-
Cycle TWh Deferred	0.8	-	-	-	-	-	-	-	-	-	-	-
TWh Supplied	-	-	-	-	-	1.2	1.7	2.4	3.6	0.2		
Cumulative TWh	2.7	3.3	6.2	9.0	9.0	7.9	6.2	3.8	0.2	0.0		
HQP Base Price	2.0%	\$ 50.04	\$ 51.04	\$ 52.06	\$ 53.10	\$ 54.16	\$ 56.35	\$ 57.48	\$ 58.63	\$ 59.80		
HQD Cycle Price	2.0%	\$ 53.83	\$ 54.91	\$ 56.00	\$ 57.12	\$ 58.27	\$ 60.62	\$ 61.83	\$ 63.07	\$ 64.33		
Net HQP Base TWh	1.1	2.5	0.1	0.3	-	0.4	1.7	2.4	3.6	0.2		
HQD Cycle TWh	1.4	2.2	2.2	2.2	-	0.8						
<b>Cost HQP Supplies</b>	<b>1,171</b>	<b>247</b>	<b>130</b>	<b>140</b>	<b>-</b>	<b>68</b>	<b>95</b>	<b>138</b>	<b>210</b>	<b>9</b>		
<b>Cumulative Cost</b>	<b>132</b>	<b>379</b>	<b>509</b>	<b>649</b>	<b>649</b>	<b>717</b>	<b>813</b>	<b>951</b>	<b>1,161</b>	<b>1,171</b>		
<b>Cumulative NPV</b>	<b>132</b>	<b>364</b>	<b>479</b>	<b>595</b>	<b>595</b>	<b>645</b>	<b>710</b>	<b>800</b>	<b>927</b>	<b>933</b>		
<b>2008 NPV</b>	<b>933</b>											
<b>6.44%</b>												
<b>Scenario Without Load Deferral</b>												
HQP Base Supplies	3.1	3.1	3.1	3.1								
HQP Cycle Supplies	2.2	2.2	2.2	2.2								
HQP Supplies	5.3	5.3	5.3	5.3								
<b>HQP Cost</b>	<b>272</b>	<b>277</b>	<b>282</b>	<b>288</b>								
Resold TWh	2.7	0.6	2.9	2.8								
Resale Price	\$ 57.27	\$ 59.97	\$ 59.15	\$ 58.65								
<b>Resale Revenue</b>	<b>(157)</b>	<b>(35)</b>	<b>(173)</b>	<b>(164)</b>								
Long Term Supplies						1.2	1.7	2.4	3.6	0.2		
L-T Supply Price	2.0%					\$ 93.47	\$ 95.34	\$ 97.25	\$ 99.19	\$ 101.17		
<b>L-T Cost</b>						<b>110.0</b>	<b>161.0</b>	<b>234.0</b>	<b>356.0</b>	<b>16.0</b>		
<b>Total Cost</b>	<b>1,468</b>	<b>115</b>	<b>242</b>	<b>124</b>	<b>-</b>	<b>110</b>	<b>161</b>	<b>234</b>	<b>356</b>	<b>16</b>		
<b>Cumulative Cost</b>	<b>115</b>	<b>357</b>	<b>467</b>	<b>591</b>	<b>591</b>	<b>701</b>	<b>862</b>	<b>1,096</b>	<b>1,452</b>	<b>1,468</b>		
<b>Cumulative NPV</b>	<b>115</b>	<b>342</b>	<b>439</b>	<b>542</b>	<b>542</b>	<b>623</b>	<b>733</b>	<b>885</b>	<b>1,101</b>	<b>1,110</b>		
<b>2008 NPV</b>	<b>1,110</b>	<b>6.44%</b>										
<b>Cost Difference</b>	<b>297</b>	<b>(16.8)</b>	<b>(5.2)</b>	<b>(15.5)</b>	<b>-</b>	<b>41.7</b>	<b>65.8</b>	<b>95.7</b>	<b>145.6</b>	<b>6.5</b>		
<b>Cum. NPV Difference</b>	<b>177</b>	<b>(16.8)</b>	<b>(21.7)</b>	<b>(52.8)</b>	<b>(52.8)</b>	<b>(22.2)</b>	<b>23.0</b>	<b>84.8</b>	<b>173.2</b>	<b>176.9</b>		

AQCCIE/CIFQ ECONOMIC ANALYSIS OF CONTRACT MODIFICATIONS												
SCENARIO: Higher Resale Price												
	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017		
<b>Scenario With Load Deferral</b>												
HQP Contract TWh	5.3	5.3	5.3	5.3								
Base TWh	3.1	3.1	3.1	3.1								
Cycle TWh	2.2	2.2	2.2	2.2								
Total TWh Deferred	2.7	0.6	2.9	2.8	-	-	-	-	-	-	-	-
Base TWh Deferred	2.0	0.6	2.9	2.8	-	-	-	-	-	-	-	-
Cycle TWh Deferred	0.8	-	-	-	-	-	-	-	-	-	-	-
TWh Supplied	-	-	-	-	-	1.2	1.7	2.4	3.6	0.2		
Cumulative TWh	2.7	3.3	6.2	9.0	9.0	7.9	6.2	3.8	0.2	0.0		
HQP Base Price	2.0%	\$ 50.04	\$ 51.04	\$ 52.06	\$ 53.10	\$ 54.16	\$ 56.35	\$ 57.48	\$ 58.63	\$ 59.80		
HQD Cycle Price	2.0%	\$ 53.83	\$ 54.91	\$ 56.00	\$ 57.12	\$ 58.27	\$ 60.62	\$ 61.83	\$ 63.07	\$ 64.33		
Net HQP Base TWh	1.1	2.5	0.1	0.3	-	0.4	1.7	2.4	3.6	0.2		
HQD Cycle TWh	1.4	2.2	2.2	2.2	0.8							
Cost HQP Supplies	1,171	247	130	140	-	68	95	138	210	9		
Cumulative Cost	132	379	509	649	649	717	813	951	1,161	1,171		
Cumulative NPV	132	364	479	595	595	645	710	800	927	933		
2008 NPV	933											
<b>Scenario Without Load Deferral</b>												
HQP Base Supplies	3.1	3.1	3.1	3.1								
HQP Cycle Supplies	2.2	2.2	2.2	2.2								
HQP Supplies	5.3	5.3	5.3	5.3								
HQP Cost	272	277	282	288								
Resold TWh	2.7	0.6	2.9	2.8								
Resale Price	\$ 67.27	\$ 69.97	\$ 69.15	\$ 68.65								
Resale Revenue	(184)	(41)	(202)	(191)								
Long Term Supplies						1.2	1.7	2.4	3.6	0.2		
L-T Supply Price						\$ 93.47	\$ 95.34	\$ 97.25	\$ 99.19	\$ 101.17		
L-T Cost						110.0	161.0	234.0	356.0	16.0		
Total Cost	1,378	88	236	81	97	-	161	234	356	16		
Cumulative Cost	88	324	404	501	501	611	772	1,006	1,362	1,378		
Cumulative NPV	88	309	380	460	460	541	652	803	1,019	1,028		
2008 NPV	1,028											
Cost Difference	207	(44.2)	(11.0)	(49.8)	-	41.7	65.8	95.7	145.6	6.5		
Cum. NPV Difference	95	(44.2)	(54.6)	(98.6)	(134.5)	(104.0)	(58.7)	3.1	91.5	95.2		

AQIE/CIQ ECONOMIC ANALYSIS OF CONTRACT MODIFICATIONS												
SCENARIO: Lower Avoided Cost												
	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017		
<b>Scenario With Load Deferral</b>												
HQP Contract TWh	5.3	5.3	5.3	5.3								
Base TWh	3.1	3.1	3.1	3.1								
Cycle TWh	2.2	2.2	2.2	2.2								
Total TWh Deferred	2.7	0.6	2.9	2.8	-	-	-	-	-	-	-	-
Base TWh Deferred	2.0	0.6	2.9	2.8	-	-	-	-	-	-	-	-
Cycle TWh Deferred	0.8	-	-	-	-	-	-	-	-	-	-	-
TWh Supplied	-	-	-	-	-	1.2	1.7	2.4	3.6	0.2	-	-
Cumulative TWh	2.7	3.3	6.2	9.0	9.0	7.9	6.2	3.8	0.2	0.0	-	-
HQP Base Price	2.0%	\$ 50.04	\$ 51.04	\$ 52.06	\$ 53.10	\$ 54.16	\$ 56.35	\$ 57.48	\$ 58.63	\$ 59.80		
HQD Cycle Price	2.0%	\$ 53.83	\$ 54.91	\$ 56.00	\$ 57.12	\$ 58.27	\$ 60.62	\$ 61.83	\$ 63.07	\$ 64.33		
Net HQP Base TWh	1.1	2.5	0.1	0.3	-	0.4	1.7	2.4	3.6	0.2		
HQD Cycle TWh	1.4	2.2	2.2	2.2	-	0.8	-	-	-	-		
Cost HQP Supplies	1,171	247	130	140	-	68	95	138	210	9		
Cumulative Cost	132	379	509	649	649	717	813	951	1,161	1,171		
Cumulative NPV	132	364	479	595	595	645	710	800	927	933		
2008 NPV	933											
<b>Scenario Without Load Deferral</b>												
HQP Base Supplies	3.1	3.1	3.1	3.1								
HQP Cycle Supplies	2.2	2.2	2.2	2.2								
HQP Supplies	5.3	5.3	5.3	5.3								
HQP Cost	272	277	282	288								
Resold TWh	2.7	0.6	2.9	2.8								
Resale Price	\$ 57.27	\$ 59.97	\$ 59.15	\$ 58.65								
Resale Revenue	(157)	(35)	(173)	(164)								
Long Term Supplies						1.2	1.7	2.4	3.6	0.2		
L-T Supply Price	\$ 75.00					\$ 82.81	\$ 84.46	\$ 86.15	\$ 87.87	\$ 89.63		
L-T Cost						97.5	142.6	207.3	315.4	14.2		
Total Cost	1,368	242	110	124	-	97	143	207	315	14		
Cumulative Cost	115	357	467	591	591	688	831	1,038	1,354	1,368		
Cumulative NPV	115	342	439	542	542	614	712	846	1,037	1,045		
2008 NPV	1,045											
Cost Difference	197	(16.8)	(5.2)	(20.7)	(15.5)	29.2	47.5	69.0	105.0	4.7		
Cum. NPV Difference	112	(16.8)	(21.7)	(40.0)	(52.8)	(31.4)	1.2	45.8	109.5	112.2		

AQCIIE/CIFQ ECONOMIC ANALYSIS OF CONTRACT MODIFICATIONS												
SCENARIO: Higher Discount Rate												
	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017		
<b>Scenario With Load Deferral</b>												
HQP Contract TWh	5.3	5.3	5.3	5.3								
Base TWh	3.1	3.1	3.1	3.1								
Cycle TWh	2.2	2.2	2.2	2.2								
Total TWh Deferred	2.7	0.6	2.9	2.8	-	-	-	-	-	-	-	-
Base TWh Deferred	2.0	0.6	2.9	2.8	-	-	-	-	-	-	-	-
Cycle TWh Deferred	0.8	-	-	-	-	-	-	-	-	-	-	-
TWh Supplied	-	-	-	-	-	1.2	1.7	2.4	3.6	0.2		
Cumulative TWh	2.7	3.3	6.2	9.0	9.0	7.9	6.2	3.8	0.2	0.0		
HQP Base Price	2.0% \$ 50.04	\$ 51.04	\$ 52.06	\$ 53.10	\$ 54.16	\$ 55.25	\$ 56.35	\$ 57.48	\$ 58.63	\$ 59.80		
HQD Cycle Price	2.0% \$ 53.83	\$ 54.91	\$ 56.00	\$ 57.12	\$ 58.27	\$ 59.43	\$ 60.62	\$ 61.83	\$ 63.07	\$ 64.33		
Net HQP Base TWh	1.1	2.5	0.1	0.3	-	0.4	1.7	2.4	3.6	0.2		
HQD Cycle TWh	1.4	2.2	2.2	2.2	-	0.8						
<b>Cost HQP Supplies</b>	<b>1,171</b>	<b>247</b>	<b>130</b>	<b>140</b>	<b>-</b>	<b>68</b>	<b>95</b>	<b>138</b>	<b>210</b>	<b>9</b>		
<b>Cumulative Cost</b>	<b>132</b>	<b>379</b>	<b>509</b>	<b>649</b>	<b>649</b>	<b>717</b>	<b>813</b>	<b>951</b>	<b>1,161</b>	<b>1,171</b>		
<b>Cumulative NPV</b>	<b>132</b>	<b>361</b>	<b>472</b>	<b>583</b>	<b>583</b>	<b>630</b>	<b>690</b>	<b>771</b>	<b>884</b>	<b>889</b>		
<b>2008 NPV</b>	<b>889</b>											
<b>Scenario Without Load Deferral</b>												
HQP Base Supplies	3.1	3.1	3.1	3.1								
HQP Cycle Supplies	2.2	2.2	2.2	2.2								
HQP Supplies	5.3	5.3	5.3	5.3								
<b>HQP Cost</b>	<b>272</b>	<b>277</b>	<b>282</b>	<b>288</b>								
Resold TWh	2.7	0.6	2.9	2.8								
Resale Price	\$ 57.27	\$ 59.97	\$ 59.15	\$ 58.65								
<b>Resale Revenue</b>	<b>(157)</b>	<b>(35)</b>	<b>(173)</b>	<b>(164)</b>								
Long Term Supplies						1.2	1.7	2.4	3.6	0.2		
L-T Supply Price						\$ 93.47	\$ 95.34	\$ 97.25	\$ 99.19	\$ 101.17		
<b>L-T Cost</b>						<b>110.0</b>	<b>161.0</b>	<b>234.0</b>	<b>356.0</b>	<b>16.0</b>		
<b>Total Cost</b>	<b>1,468</b>	<b>242</b>	<b>110</b>	<b>124</b>	<b>-</b>	<b>110</b>	<b>161</b>	<b>234</b>	<b>356</b>	<b>16</b>		
<b>Cumulative Cost</b>	<b>115</b>	<b>357</b>	<b>467</b>	<b>591</b>	<b>591</b>	<b>701</b>	<b>862</b>	<b>1,096</b>	<b>1,452</b>	<b>1,468</b>		
<b>Cumulative NPV</b>	<b>115</b>	<b>339</b>	<b>433</b>	<b>532</b>	<b>532</b>	<b>607</b>	<b>708</b>	<b>845</b>	<b>1,037</b>	<b>1,045</b>		
<b>2008 NPV</b>	<b>1,045</b>											
<b>Cost Difference</b>	<b>297</b>	<b>(16.8)</b>	<b>(5.2)</b>	<b>(20.7)</b>	<b>-</b>	<b>41.7</b>	<b>65.8</b>	<b>95.7</b>	<b>145.6</b>	<b>6.5</b>		
<b>Cum. NPV Difference</b>	<b>156</b>	<b>(16.8)</b>	<b>(21.6)</b>	<b>(39.4)</b>	<b>(51.6)</b>	<b>(23.2)</b>	<b>18.2</b>	<b>74.1</b>	<b>152.7</b>	<b>156.0</b>		

AQCI/CIFQ ECONOMIC ANALYSIS OF CONTRACT MODIFICATIONS												
SCENARIO: Worst Case												
	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017		
<b>Scenario With Load Deferral</b>												
HQP Contract TWh	5.3	5.3	5.3	5.3								
Base TWh	3.1	3.1	3.1	3.1								
Cycle TWh	2.2	2.2	2.2	2.2								
Total TWh Deferred	2.7	0.6	2.9	2.8	-	-	-	-	-	-	-	-
Base TWh Deferred	2.0	0.6	2.9	2.8	-	-	-	-	-	-	-	-
Cycle TWh Deferred	0.8	-	-	-	-	-	-	-	-	-	-	-
TWh Supplied	-	-	-	-	-	1.2	1.7	2.4	3.6	0.2		
Cumulative TWh	2.7	3.3	6.2	9.0	9.0	7.9	6.2	3.8	0.2	0.0		
HQP Base Price	2.0%	\$ 50.04	\$ 51.04	\$ 52.06	\$ 53.10	\$ 54.16	\$ 55.25	\$ 56.35	\$ 57.48	\$ 58.63	\$ 59.80	
HQD Cycle Price	2.0%	\$ 53.83	\$ 54.91	\$ 56.00	\$ 57.12	\$ 58.27	\$ 59.43	\$ 60.62	\$ 61.83	\$ 63.07	\$ 64.33	
Net HQP Base TWh	1.1	2.5	0.1	0.3	-	0.4	1.7	2.4	3.6	0.2		
HQD Cycle TWh	1.4	2.2	2.2	2.2	0.8							
<b>Cost HQP Supplies</b>	<b>1,171</b>	<b>247</b>	<b>130</b>	<b>140</b>	<b>-</b>	<b>68</b>	<b>95</b>	<b>138</b>	<b>210</b>	<b>9</b>		
<b>Cumulative Cost</b>	<b>132</b>	<b>379</b>	<b>509</b>	<b>649</b>	<b>649</b>	<b>717</b>	<b>813</b>	<b>951</b>	<b>1,161</b>	<b>1,171</b>		
<b>Cumulative NPV</b>	<b>132</b>	<b>361</b>	<b>472</b>	<b>583</b>	<b>583</b>	<b>630</b>	<b>690</b>	<b>771</b>	<b>884</b>	<b>889</b>		
<b>2008 NPV</b>	<b>889</b>											
<b>Scenario Without Load Deferral</b>												
HQP Base Supplies	3.1	3.1	3.1	3.1								
HQP Cycle Supplies	2.2	2.2	2.2	2.2								
HQP Supplies	5.3	5.3	5.3	5.3								
<b>HQP Cost</b>	<b>272</b>	<b>277</b>	<b>282</b>	<b>288</b>								
Resold TWh	2.7	0.6	2.9	2.8								
Resale Price	\$ 67.27	\$ 69.97	\$ 69.15	\$ 68.65								
<b>Resale Revenue</b>	<b>(184)</b>	<b>(41)</b>	<b>(202)</b>	<b>(191)</b>								
Long Term Supplies						1.2	1.7	2.4	3.6	0.2		
L-T Supply Price	\$ 75.00					\$ 82.81	\$ 84.46	\$ 86.15	\$ 87.87	\$ 89.63		
<b>L-T Cost</b>						<b>97.5</b>	<b>142.6</b>	<b>207.3</b>	<b>315.4</b>	<b>14.2</b>		
<b>Total Cost</b>	<b>1,278</b>	<b>88</b>	<b>236</b>	<b>81</b>	<b>97</b>	<b>97</b>	<b>143</b>	<b>207</b>	<b>315</b>	<b>14</b>		
<b>Cumulative Cost</b>	<b>88</b>	<b>324</b>	<b>404</b>	<b>501</b>	<b>501</b>	<b>598</b>	<b>741</b>	<b>948</b>	<b>1,263</b>	<b>1,278</b>		
<b>Cumulative NPV</b>	<b>88</b>	<b>306</b>	<b>375</b>	<b>452</b>	<b>452</b>	<b>518</b>	<b>608</b>	<b>729</b>	<b>899</b>	<b>906</b>		
<b>2008 NPV</b>	<b>906</b>											
<b>Cost Difference</b>	<b>107</b>	<b>(44.2)</b>	<b>(11.0)</b>	<b>(49.8)</b>	<b>(43.3)</b>	<b>29.2</b>	<b>47.5</b>	<b>69.0</b>	<b>105.0</b>	<b>4.7</b>		
<b>Cum. NPV Difference</b>	<b>17</b>	<b>(44.2)</b>	<b>(54.5)</b>	<b>(97.2)</b>	<b>(131.6)</b>	<b>(111.7)</b>	<b>(81.8)</b>	<b>(41.6)</b>	<b>15.1</b>	<b>17.5</b>		