

Réponse du Transporteur à l'engagement 9

(Demandé par AHQ-ARQ)

Engagement 9

(Demandé par AHQ-ARQ, Me Steve Cadrin).

Référence : HQT-10, Document 6.1, page 12.

Texte de l'engagement.

Valider les données apparaissant à la page no. 12 de la pièce HQT-10, Document 6.1 (B-0061) pour les compagnies suivantes :

- Central Maine Power Company
- Ohio Valley Electric Corporation

Please confirm the data indicated on the page nr. 12 of the evidence HQT-10, Document 6.1 (Régie de l'énergie's reference nr.is B-0061) for the following companies :

- Central Maine Power Company
- Ohio Valley Electric Corporation

Réponse

We can confirm that the data we provided in the table in exhibit B-61, page 12 for Central Maine Power and Ohio Valley Electric Corporation are the data recorded in the S&P Global database, which Brattle used for its productivity and benchmarking studies and are the data that are in our model. There was no error by Brattle in transferring the data from S&P Global into our model or from transferring the data in our model into the cited table. We note that S&P Global is a well-established and respected data vendor with deep expertise in working with the FERC Form 1 data and whose databases are used in regulatory proceedings in North America, as alluded to by PEG in their Cost Research Guidelines for this TFP study¹ and was also used by PSE for their productivity and benchmarking studies in the MRI for Hydro One².

¹ Cost Research Guidelines for Hydro-Québec Transmission, Pacific Economics Group Research LLC, October 17, 2019, page 22.

² Transmission Study for Hydro One Networks Inc.: Recommended CIR and Productivity Comparisons, Power Systems Engineering, Inc., May 23, 2018, Footnote 14, Page 21.