

REDACTED

1 **Request IR-77:**

2
3 **With respect to Confidential Exhibit SFR, OE-01M, Attachment 1**

4
5 a) **Please provide copies of the contracts under which each type of transaction takes**
6 **place.**

7 b) **Please provide lists of the individual transactions entered pursuant to each contract**
8 **from the fourth quarter of 2006 through 2008 year to date. Please organize the lists**
9 **by type of transaction, and include**

10 i. **Date each transaction was entered into,**

11 ii. **Any internal identifying number (deal number, etc.),**

12 iii. **Counter-party**

13 i. **Hourly/daily quantity transacted (as appropriate)¹,**

14 ii. **Receipt location,**

15 iii. **Delivery location,**

16 iv. **Flow start date,**

17 v. **Flow end date,**

18 vi. **Price**

19 vii. **Whether price is indexed or fixed,**

20 viii. **Price mechanism, e.g., set price, fee-for-service, etc., and**

21 ix. **Individual NSPI employee responsible for the transaction.**

22 c) **Please provide the lists in Microsoft Excel format, on a compact disk (CD).**

23
24 **Response IR-77:**

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26 a) **Please refer to Liberty IR-28 and Liberty IR-18**

27
28 b-c) **Please refer to Confidential Attachments 1 and 2. Please also refer to Liberty IR-1 for**
29 **NSPI employee responsibilities.**

¹ Natural gas is typically transacted as a daily quantity, whereas electricity is typically transacted hourly.

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1 **Request IR-78:**

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3 **With respect to Confidential Exhibit SFR, OE-01Q, Attachment 1, Page 1. The Net Gas**
4 **Margin data given for 2002 and 2003 are considerably larger than the counterpart data**
5 **provided in response to Liberty IR-103 in Docket No. NSUARB P-886 (response filed**
6 **December 6, 2006). The volumes sold data is the same for 2002, but is a little different for**
7 **the other years reported in both sources. Please explain.**

8

9 Response IR-78:

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11 The differences in reported net gas margin data for 2002 and 2003 reflect the allocation of
12 pipeline costs. Liberty IR-103 had included the pipeline costs associated with gas resale and was
13 reported as a separate line item. The following is a summary of the differences:

14

	2002	2003
Reported natural gas margin		
Allocated pipeline charge		
Net natural gas margin		

15

16 The differences in reported volumes for the periods 2003, 2004 and 2005 reflect the
17 classification of US pipeline losses. OE-01Q Attachment 1 includes the US pipeline losses.

NON-CONFIDENTIAL

1 **Request IR-79:**

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3 **With respect to direct evidence. Refer to SFR, Confidential OE-01C, Attachment 1, Page 1**
4 **of 1. For 2007, the actual NSPI generation from the diesel combustion turbines is reported**
5 **as 7.3 GWh. The NSPI forecast projects combustion turbine diesel generation at 107.6**
6 **GWh for 2008 and 105.8 GWh for 2009. Please provide a detailed explanation why the**
7 **forecast diesel generation for 2008 and 2009 is significantly greater than that level actually**
8 **experienced in 2007.**

9

10 Response IR-79:

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12 Each hour of the day, the 24-hour energy marketing desk monitors the most economic dispatch
13 available in the system. In 2007 market price import energy was available at an economic cost
14 as compared to combustion turbines, for more hours than forecast.

15

REDACTED

1 **Request IR-80:**

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3 **With respect to direct evidence. Refer to SFR, Confidential OE-01C, Attachment 1, Page 1**
4 **of 1. For 2007, the actual amount of power purchases [REDACTED]. The NSPI forecast**
5 **includes power purchases of [REDACTED]. Please explain**
6 **why purchased power decreases in 2008 and 2009 from the levels actually experienced in**
7 **2007, especially since import purchases are less expensive than CT diesel generation.**

8

9 Response IR-80:

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11 The forecast of power purchases in the fuel forecast is a combination of power purchase
12 agreements and spot power imports from the wholesale market. The market pricing in 2007
13 allowed for more economic purchases than forecast. When more economic import power is not
14 available, combustion turbines are forecasted.

15

NON-CONFIDENTIAL

1 **Request IR-81:**

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3 **With respect to direct evidence. Please provide the hours for each month that the NSPI**
4 **combustion turbine diesel generation coincided with the NSPI system peak for actual 2007,**
5 **and for the forecast years of 2008 and 2009. Also provide the hours for each month that the**
6 **diesel generation did not coincide with the NSPI system peak for the same periods.**

7

8 Response IR-81:

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10 The hours for each month when NSPI combustion diesel generation did and did not coincide
11 with the NSPI system peak for 2007 are as follows:

12

Month	Coincident Hours	Non-Coincident Hours
January 2007	1	20
February 2007	1	9
March 2007	0	10
April 2007	0	0
May 2007	1	16
June 2007	1	11
July 2007	0	17
August 2007	0	4
September 2007	0	9
October 2007	0	5
November 2007	0	13
December 2007	1	110

13

14 With respect to 2008 and 2009, the forecast of combustion turbine diesel generation cannot be
15 provided. Strategist is not an hourly chronological dispatch model and thus does not provide
16 hourly dispatch for individual units.

17

NON-CONFIDENTIAL

1 **Request IR-82:**

2

3 **With respect to direct evidence. Refer to SFR, Confidential OE-01A, Attachment 1, Page**
4 **11 of 16. Please explain why the diesel combustion turbines are dispatched in the 2009**
5 **forecast year in all 12 months, rather than just during the peak usage months.**

6

7 Response IR-82:

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9 Factors such as bulk power system stability, forced outages and intermittent power sources can
10 result in shorter operating periods where dispatch of combustion turbines is the most cost
11 effective option.

12

13 Strategist considers the load forecast and available resources and dispatches combustion turbines
14 when it is economic.

15

NON-CONFIDENTIAL

1 **Request IR-83:**

2

3 **With respect to direct evidence. Refer to SFR, Confidential OE-01A, Attachment 1, Page**
4 **11 of 16. Please explain why less expensive import purchased power or Tufts Cove**
5 **generation are not dispatched rather than use the diesel combustion turbines at any time in**
6 **the off-peak months of March-December in 2009.**

7

8 Response IR-83:

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10 Please refer to Liberty IR-82.

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REDACTED

1 **Request IR-84:**

2

3 **With respect to direct evidence. Refer to SFR, Confidential OE-01A, Attachment 1, Page**
4 **13 of 16. Please explain why the diesel combustion turbines, at a 2009 average of**
5 **██████████, would be dispatched to make export sales at any time, when the average**
6 **revenue from such sales is forecast at only ██████████ in 2009.**

7

8 **Response IR-84:**

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10 NSPI applies a margin on all export sales. The ██████████ represents the average revenue
11 received on export sales, from all generating units. ██████████ represents the average cost of CT
12 production, and a margin is added to such cost.

13