

ICNU Data Request 27.18

Please refer to GND-5T, page 56, line 9-10 (“*Moreover, ICNU provides no explanation of its adjustment or evidence to support it.*”) Does Mr. Duvall dispute that Mr. Falkenberg computed this adjustment by taking the difference between the number of combined cycle plant starts in the Company’s GRID study and in his own GRID model runs and multiplied the difference by the per start cost used by the Company in GRID and in its screening methodology? Please explain.

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No. Mr. Duvall understands the calculation performed by Mr. Falkenberg to arrive at Adjustment 22. The referenced section from Mr. Duvall’s testimony was not intended to question Mr. Falkenberg’s calculation but to question why such an adjustment is appropriate given the fact that the Company does not include any additional O&M costs in its net power cost calculation.

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