

ENWAVE INTERROGATORY #2

INTERROGATORY

Issue 1.2: Should the new business activity – Geothermal Energy Service Program – be considered as part of the utility’s regulated business?

Please identify the market failure that this Program is meant to solve.

RESPONSE

As discussed in the response to Enwave Interrogatory #1 filed at Exhibit I.1.EGDI.ENWAVE.1, market failure is not the only reason for regulation. Please see the response to Board Staff Interrogatory #2a) filed at Exhibit I.1.EGDI.STAFF.2 for the market barriers this program is meant to overcome and also the Company’s response to SEC Interrogatory #11 filed at Exhibit I.1.EGDI.SEC.11.