

Requests for Information

1 NP-CA-003 **Reference: *Comments on Newfoundland Power’s 2022 Capital Budget***
2 ***Application, Elenchus Research Associates Inc., August 13, 2021, page***
3 ***13, line 3-6, and page 18, lines 23-27.***
4
5 ***“It will normally be expected that all (emphasis added) alternatives that***
6 ***do not have unacceptable implications in terms of maintaining an***
7 ***adequate, reliable and safe supply of power be considered in a cost-benefit***
8 ***analysis that compares the feasible alternatives.”***
9 ***“... the Prudence Review Standard in Order No. P.U. 13(2016) have been***
10 ***fulfilled. In particular, as stated in the Order (quoted above):***
11 ***Prudent decisions and actions require that management follow specific***
12 ***practices:***
13 ***1. identify all relevant information***
14 ***2. identify a reasonable range of (emphasis added) alternative solutions”***
15
16 **QUESTION:** **Would Elenchus agree that Order No. P.U. 13 (2016) requires**
17 **consideration of a reasonable range of alternatives, not all alternatives?**
18 **If not, why not?**
19
20 **RESPONSE:** Elenchus agrees that Order No. P.U. 13 (2016) requires consideration of a
21 reasonable range of alternatives, not all alternatives. It may also be noted
22 that considering a single alternative would not normally meet the test of
23 identifying a reasonable range of alternatives. By definition, a range
24 requires at least two alternatives.
25
26 Furthermore, in Elenchus’ view the evidence supporting the reasonable
27 range of alternatives included would be expected to be supported by a
28 credible process that minimizes the reason that a credible alternative has
29 not been “screened out”, as discussed in the response to NP-CA-002,
30 without due consideration.