

HAND DELIVERED

July 20, 2009

Board of Commissioners
of Public Utilities
P.O. Box 21040
120 Torbay Road
St. John's, NL A1A 5B2

Attention: G. Cheryl Blundon
Director of Corporate Services
and Board Secretary

Ladies & Gentlemen:

**RE: Newfoundland and Labrador Hydro – Application for approval of the Rate Stabilization
Plan components of the rates to be charged to Industrial Customers**

Enclosed are Newfoundland Power's Requests for Information in relation to the above noted Application.

For convenience, the Requests for Information are provided on three-hole punched paper.

A copy of this letter, together with enclosures, has been forwarded directly to the parties listed below. An electronic copy in Adobe format will follow.

Yours very truly,



Peter Alteen
Vice President, Regulatory Affairs
& General Counsel

Enclosures

c. Geoff Young
Newfoundland and Labrador Hydro

Joseph Hutchings, Q.C.
Poole Althouse

Paul Coxworthy
Stewart, McKelvey, Stirling, Scales

Tom Johnson
Consumer Advocate



Join us in the fight against cancer

IN THE MATTER OF

the Public Utilities Act (R.S.N.L. 1990,
Chapter P-47 (the "Act"), and

IN THE MATTER OF an Application
by Newfoundland and Labrador Hydro for the
approval, pursuant to Sections 70(1) and 76 of
the Act, of the Rate Stabilization Plan components
of the rates to be charged to Industrial Customers.

**Newfoundland Power
Requests for Information**

NP-NLH-1 to NP-NLH-18

Issued: July 20, 2009

NP-NLH-1

Please provide the scope and the timelines of the RSP Review provided for in the Settlement Agreement in Order No. P.U. 8 (2007).

NP-NLH-2

Please provide all written correspondence between Hydro and the Board with respect to RSP Review since the issuing of Order No. P.U. 8 (2007).

NP-NLH-3

Provide a comparison of monthly RSP balances in the Industrial and Retail Plan related to the load variation component for the period January 1, 2008 to June 30 2009 using both the existing approach to computing the load variation component and Hydro's proposed approach for the load variation component provided in the 2006 RSP review report provided with the Application.

NP-NLH-4

Provide a comparison of the forecast monthly RSP balances in the Industrial and Retail Plan related to the load variation component for the period July 1, 2009 to December 31st 2010 using both the existing approach to computing the load variation component and Hydro's proposed approach for the load variation component provided in the 2006 RSP review report provided with the Application.

NP-NLH-5

Please provide the scope and the timelines for the Industrial Customers Rate Review provided for in the Settlement Agreement in Order No. P.U. 8 (2007).

NP-NLH-6

Please provide a copy of the Industrial Rate Design Review report filed with the Board and all related written correspondence between the parties to the Settlement Agreement since the report was filed.

NP-NLH-7

Please provide an illustration of the potential impacts on the balance in the load variation component of the RSP effective June 30, 2009 if a two-block rate structure for Industrial Customers with a marginal cost based second block had been implemented effective on January 1, 2008.

NP-NLH-8

Provide an illustration of the costs for a single year that would be charged to the Industrial RSP Plan and the Retail RSP Plan through the current load variation component if Vale Inco requires its full annual operational load requirements prior to Hydro's next general rate application (i.e., assume the Vale Inco energy requirement is the only load variation for purpose of the computations). In this response, please show and explain the basis of the calculations.

NP-NLH-9

Does Hydro believe that the load variation component in its current form results in a fair allocation of energy costs among all customer classes between test years if either an existing large industrial customer shuts down operations or a new large industrial customer begins operations? Please explain why or why not.

NP-NLH-10

Identify the balance for each year credited to the Industrial RSP through the load variation component at: year-end 2007, year-end 2008; June 30 2009; and forecast year-end 2009 and 2010 resulting from production shutdowns in the pulp and paper industry.

NP-NLH-11

Further to NP-NLH-10, please identify each plant shutdown event, the timing of the shutdown event, the cumulative GWh reduction that resulted from each event and estimate the impact through the load variation component on the June 30th 2009 Industrial RSP balance from each event.

NP-NLH-12

Please provide the cumulative load variation transfer to the Industrial RSP that occurred over the period November 2005 to December 2006 that resulted from the closure of the Abitibi Stephenville paper mill and estimate the resulting annual bill reduction for each existing industrial customer for 2007, 2008 and 2009 forecast.

NP-NLH-13

Assume the balance related to the load variation component as of June 30, 2009 is allocated among each existing industrial customer based on their most recent 12 months energy use and disbursed to each on that same date. Incorporating this rate rebate, provide a computation of the average unit price on a ¢ per kWh basis for electrical service for each existing industrial customer for the period January 1, 2007 to June 30, 2009.

NP-NLH-14

Please provide on a ¢ per kWh basis, for both Newfoundland Power and IC, a comparison of the 2007 approved revenue requirement based on Order No. P.U. 8 (2007) with the pro-forma 2007 revenue requirement derived if the 2009 load forecast was used in setting rates for 2007.

NP-NLH-15

Please calculate an Industrial RSP adjustment factor using the fuel rider calculated based on the fuel forecast used to establish the fuel rider in the RSP rate for Newfoundland Power and a recovery factor based on the June 30th RSP balance in the Industrial RSP excluding the cumulative portion related to the Industrial RSP load variation component.

NP-NLH-16

Provide the customer rate impact for each industrial customer of implementing final industrial customer rates based on the RSP factor derived in NP-NLH-15 combined with the existing industrial customer base rates that resulted from the Order No. P.U. 8 (2007).

NP-NLH-17

Please provide the RSP Activity Report as of June 30, 2009.

NP-NLH-18

Please provide a ¢ per kWh breakdown of the current Industrial RSP charge (i.e., fuel rider, current plan component and historical plan component).