



July 14, 2015

Ms. G. Cheryl Blundon
Board of Commissioners of Public Utilities
120 Torbay Road, P.O. Box 12040
St. John's, NL A1A 5B2

Ladies & Gentlemen:

Re: Newfoundland and Labrador Hydro's 2013 Amended General Rate Application
Re: Requests for Information CA-NLH-361 to CA-NLH-372

Please find enclosed the original and twelve (12) copies of the Consumer Advocate's Requests for Information numbered CA-NLH-361 to CA-NLH-372 in relation to the above noted Application.

A copy of the letter, together with enclosure, has been forwarded directly to the parties listed below.

If you have any questions regarding the filing, please contact the undersigned at your convenience.

Yours very truly,

O'DEA, EARLE



THOMAS JOHNSON, Q.C.
TJ/cel

cc: Newfoundland & Labrador Hydro
P.O. Box 12400
500 Columbus Drive
St. John's, NL A1B 4K7
Attention: Geoffrey P. Young, Senior Legal Counsel

Newfoundland Power
P.O. Box 8910
55 Kenmount Road
St. John's, NL A1B 3P6
Attention: Gerard Hayes, Senior Legal Counsel



Vale Newfoundland and Labrador Limited
c/o Cox & Palmer
Suite 1000, Scotia Centre
235 Water Street
St. John's, NL A1C 1B6
Attention: Thomas J. O'Reilly, Q.C.

Towns of Labrador City, Wabush,
Happy Valley-Goose Bay and North West River
c/o Brown Fitzgerald Morgan & Avis
P.O. Box 23135
Terrace on the Square
St. John's, NL 1B 4J9
Attention: Dennis Browne, Q.C.

House of Commons
Confederation Building, Room 682
Ottawa, ON K1A 0A6
Attention: Yvonne Jones, MP Labrador/Christian von Donat

Innu Nation
c/o Olthuis, Kleer, Townshend LLP
250 University Avenue, 8th Floor
Toronto, ON M5H 3E5
Attention: Nancy Kleer

Corner Brook Pulp & Paper Limited,
North Atlantic Refining Limited and
Teck Resources
c/o Stewart McKelvey
Cabot Place, 100 New Gower Street
P.O. Box 5038
St. John's, NL A1C 5V3
Attention: Paul Coxworthy

Nunatsiavut Government
c/o Benson Buffett
PO Box 1538
9th Floor, Atlantic Place
215 Water Street
St. John's, NL A1C 5N8
Attention: Genevieve M. Dawson

IN THE MATTER OF
the *Public Utilities Act*, RSNL 1990,
Chapter P-47 (the "*Act*");

AND

IN THE MATTER OF
a General Rate Application (the "*Amended Application*")
by Newfoundland and Labrador Hydro for
approvals of, under Sections 70 and 75 of the Act, changes
in the rates to be charged for the supply of power
and energy to Newfoundland Power, Rural Customers
and Industrial Customers; and under Section 71 of the
Act, changes in the Rules and Regulations applicable
to the supply of electricity to Rural Customers.

**CONSUMER ADVOCATE
REQUESTS FOR INFORMATION
CA-NLH-361 to CA-NLH-372**

Issued: July 14, 2015

1 CA-NLH-361 (Reference interim rates approvals in Board Orders No. P.U.
2 17(2015) and No. P.U. 21(2015)) Please provide a table showing
3 for each customer class the average rates in cents/kWh: 1) prior to
4 implementation of interim rates; i.e., on January 1, 2015), 2)
5 following implementation of interim rates (i.e., on July 1, 2015),
6 and 3) assuming rates proposed in the Amended 2013 GRA are
7 approved. Please include columns showing the percentage rate
8 increase in each instance.

9
10 CA-NLH-362 (Reference interim rates approvals in Board Orders No. P.U.
11 17(2015) and No. P.U. 21(2015)) Following the approval of interim
12 rates, what percentage rate increase is required to bring each customer
13 class rate up to the rates proposed in the Amended 2013 GRA
14 including all of the proposed rate adders/riders; i.e., such as the 2014
15 revenue deficiency, the 2015 revenue deficiency, etc?

16
17 CA-NLH-363 (Reference interim rates approvals in Board Orders No. P.U.
18 17(2015) and No. P.U. 21(2015)) What is Hydro now proposing as a
19 transition plan for bringing Island Industrial Customer rates up to the
20 full cost of supply determined by the 2015 test year cost of service
21 study consistent with Government Directive OC2013-089, as
22 amended?

23
24 CA-NLH-364 Since OC2013-089, as amended, was issued, how much have IIC
25 rates been increased before and after accounting for the revenue
26 transfer from the RSP account set up to fund Hydro's revenue loss;
27 i.e., how much have IIC rates been increased on paper and how much
28 are the IICs actually paying on an average basis?

29
30 CA-NLH-365 Please update the response to RSP-CA-NLH-7 to include the years
31 2013 and 2014.

32

1 CA-NLH-366 (Reference RSP-CA-NLH-7) Please complete the following table
 2 for each year from 2008 through 2014 (the table below shows only
 3 2012). The column titled COS Revenue refers to the revenues that
 4 would have been generated had IIC rates not been frozen and the
 5 load variation component of the RSP had been allowed to operate
 6 based on energy shares which Hydro has indicated most closely
 7 approximates cost of service.
 8

<i>Customer</i>	<i>Average Actual Revenue (cents/kWh)</i>	<i>Average COS Revenue (cents/kWh)</i>	<i>Revenue/Cost Ratio (%)</i>
CBPP	5.14	8.32	61.8
NARL	3.97	7.15	55.6
Teck	2.99	7.38	40.5
IIC Total	4.08	7.47	54.6
NP	7.95		

9

10

11 CA-NLH-367 Please file a copy of the correspondence from CBPP when it first
 12 notified Hydro that it would be reducing energy demand from 278
 13 GWh in 2008 to 95 GWh in 2009 (see RSP-CA-NLH-7).

14

15 CA-NLH-368 Please file a copy of the most recent correspondence from Vale
 16 notifying Hydro of its forecast load.

17

18 CA-NLH-369 Please provide a comparison of forecast to actual energy load on
 19 the Island for each customer class according to the following:

20

- 21 • As forecast in the 2006 GRA for the years 2007 through 2014;
- 22 • As forecast in the 2013 GRA for the years 2013 and 2014;
- 23 • As forecast in the Amended 2013 GRA for year-to-date 2015.

- 1 CA-NLH-370 What are Hydro's contractual/regulatory obligations relating to
2 connection facilities, and more specifically, the CBPP frequency
3 converter; i.e., what liabilities would Hydro face if it did not maintain
4 the frequency converter?
5
- 6 CA-NLH-371 When was the frequency converter first placed into service?
7
- 8 CA-NLH-372 Please provide a list of occasions when Hydro has had to purchase
9 power from the CBPP cogeneration facility when it was spilling water
10 at its hydro facilities owing to high water levels.

Dated at St. John's in the Province of Newfoundland and Labrador, this 14th day of July, 2015.



Thomas Johnson, Q.C.
Consumer Advocate
323 Duckworth Street
St. John's, NL A1C 5X4
Telephone: (709) 726-3524
Facsimile: (709) 726-9600
Email: tjohnson@odeaearle.ca