IN THE MATTER OF the Electrical Power Control Act, RSNL 1994, Chapter E-5.1 (the EPCA) and the Public Utilities Act, RSNL 1990, Chapter P-47 (the Act), and regulations thereunder;

AND IN THE MATTER OF an Application
By Newfoundland and Labrador Hydro
Pursuant to Subsections 41(3) of the Act, for
The approval of refurbishment of the marine terminal at the
Holyrood Thermal Generating Station.

Requests for Information by The Consumer Advocate

CA-NLH-01 to CA-NLH-13

March 4, 2013

| 1 | CA-NLH-01 | Does Hydro plan to eliminate its revised docking procedure (outlined at pp. 4-5) if |
|----|-----------|---|
| 2 | | the proposed repairs are allowed? If so, on what basis is Hydro eliminating |
| 3 | | same? If not, why not? |
| 4 | | |
| 5 | CA-NLH-02 | How did the revised docking procedure described at pp. 4-5 of Hydro's report |
| 6 | | differ from the procedure that was previously in place? |
| 7 | | |
| 8 | CA-NLH-03 | What is Hydro planning to do with the marine terminal when it is no longer |
| 9 | | needed? |
| 10 | | |
| 11 | CA-NLH-04 | Hatch's letter of May 16, 2012 states that it is Hatch's opinion that it is essential |
| 12 | | to have two functional fenders on both the North and South ends of the jetty. |
| 13 | | Can Hatch provide support for this opinion in any of the published standards |
| 14 | | and/or guidelines referred to at p. B9 of its Holyrood Marine Terminal 10 Year |
| 15 | | Life Extension Study (at Appendix B)? If so, please provide the excerpts in |
| 16 | | support. |
| 17 | | |

| 1 2 3 4 5 6 7 8 9 | CA-NLH-05 | Hatch states in its May 16 th , 2012 correspondence found at Appendix A the following: "The structural analysis performed in 2011 showed that under controlled conditions, with fully functional fenders at a docking velocity of 0.125 m/sec, the jetty structure was structurally sound. This study also showed that under controlled conditions only one fender on either the North or South end of the jetty was required to safely transfer the ships docking force into the structure. The critical statement here is the fenders have to be functioning as designed." Is Hydro's revised docking procedures resulting in conditions whereby only one fender on either the North or South end of the jetty is required? |
|---|-----------|--|
| 11 | | |
| 12 | | |
| 13 | CA-NLH-06 | According to Appendix E, Hydro has been involved in nighttime arrival or |
| 14 | | departures of tankers. Given same, why does Hydro state at Page 18 that |
| 15 | | "Improvements to the lighting system could also create the opportunity for night |
| 16 | | time arrival and departure"? |
| 17 | | |
| 18 19 | CA-NLH-07 | During an offload, how many Hydro employees are required to be on the marine terminal? |
| 20 | | |
| 21 | CA-NLH-08 | What is the life expectancy of the new lighting stands that Hydro is proposing to |
| 22 | | install? |
| 23 | | |
| 24 | CA-NLH-09 | The Hatch report at Appendix B briefly addresses lighting upgrades at p. 25 of its |
| 25 | | report (B31 of Appendix B). Did Hydro ask Hatch to consider whether a routine |
| 26 | | bulb replacement regime or schedule could obviate the need for this project? |
| 27 | | |
| 28 | CA-NLH-10 | What is the elevation of the proposed new light fixtures and would bulb |
| 29 | | replacement still require the use of a bucket truck? If not, how would bulbs be |
| 30 | | replaced? |
| 31 | | |
| 32 | CA-NP-11 | At p. 32 of Hydro's report it is stated that the fixtures would be updated to a more |
| 33 | | current standard to provide an extended service life, thereby reducing the |
| 34 | | frequency of bulb replacement. What is the anticipated extended service life of |

| I | | the builds as compared to status quo? |
|----|-----------|--|
| 2 | | |
| 3 | CA-NP-12 | How many bulbs are in the present lighting system? How many 35 foot |
| 4 | | structures are in the current lighting system? |
| 5 | | |
| 6 | | |
| 7 | CA-NLH-13 | Given the limited time the marine terminal will be required, has Hydro consulted |
| 8 | | Hatch to determine if further "temporary repairs" with monitoring would be a |
| 9 | | viable least cost option in conjunction with the revised docking procedure? |
| 10 | | |

Dated at St. John's in the Province of Newfoundland and Labrador, this 4th day of March, 2013.

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