



NEWFOUNDLAND AND LABRADOR
BOARD OF COMMISSIONERS OF PUBLIC UTILITIES
120 Torbay Road, P.O. Box 21040, St. John's, Newfoundland and Labrador, Canada, A1A 5B2

2015-08-20

Mr. Geoff Young
Newfoundland and Labrador Hydro
P. O. Box 12400
Hydro Place, Columbus Drive
St. John's, NL A1B 4K7

Dear Sir:

Re: Newfoundland and Labrador Hydro – Amended General Rate Application – Prudence Review – Requests for Information

Enclosed are Information Requests PR-PUB-NLH-187 to PR-PUB-NLH-210 regarding the above-noted application. As previously noted in the Board's August 13, 2015 correspondence, the deadline for filing the responses to the Requests for Information is September 3, 2015.

If you have any questions, please do not hesitate to contact the Board's Legal Counsel, Ms. Jacqui Glynn, by email, jglynn@pub.nl.ca or by telephone 709-726-6781.

Yours truly,


Cheryl Blundon
Board Secretary

/epj
Encl.

cc. **Newfoundland & Labrador Hydro**
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NLH Regulatory, E-mail: NLHRegulatory@nlh.nl.ca
Consumer Advocate
Mr. Thomas Johnson, Q.C., E-mail: tjohnson@odeaearle.ca
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Towns of Labrador City, Wabush, Happy Valley-Goose Bay and North West River
Mr. Dennis Browne, Q.C., E-mail: dbrowne@bfina-law.com
Mittler & Hearn, E-mail: miller&hearn@crstv.net
Ms. Melanie Dawe, E-mail: mdawe@bfina-law.com
Sierra Club Canada
Mr. Fred Winsor, E-mail: winsorf@nl.rogers.com

1 **IN THE MATTER OF** the *Electrical Power*
2 *Control Act, 1994*, SNL 1994, Chapter E-5.1 (the
3 "*EPCA*") and the *Public Utilities Act*, RSNL 1990,
4 Chapter P-47 (the "*Act*"), as amended, and regulations
5 thereunder; and

6
7 **IN THE MATTER OF** a general rate application
8 filed by Newfoundland and Labrador Hydro on
9 July 30, 2013; and

10
11 **IN THE MATTER OF** an amended general rate
12 application filed by Newfoundland and Labrador
13 Hydro on November 10, 2014; and

14
15 **IN THE MATTER OF** a prudence review relating to
16 certain actions and costs of Newfoundland and Labrador
17 Hydro.

**PUBLIC UTILITIES BOARD
REQUESTS FOR INFORMATION**

PR-PUB-NLH-187 to PR-PUB-NLH-210

Issued: August 20, 2015

1 **Supply Related Costs**

2
3 **PR-PUB-NLH-187** Reference: Hydro's Reply, page 7, lines 11-14. Further to the response to
4 PR-PUB-NLH-129 (Revision 1), please provide a spreadsheet of the
5 calculation that results in estimated replacement costs of \$504,610. In the
6 response include the derivation of the \$1,533,991 total replacement costs
7 for the period referred to on page 2 of the response.
8

9 **PR-PUB-NLH-188** Please provide the hourly system load for each hour of January 4, 2014
10 and January 8, 2014.
11

12 **PR-PUB-NLH-189** Reference: Hydro's Reply, page 7, lines 8-17. Please provide the source
13 documents and calculation of the Holyrood Unit 1 supply costs for
14 January 5, 2014 of \$477,647 related to the unit vibration issues on restart.
15

16 **PR-PUB-NLH-190** Reference: Hydro's Reply, page 7, lines 8-17. Please provide the source
17 documents and a comparison of Hydro's calculations of Replacement
18 Power figures of \$504,610 and \$477,647 referred to in this paragraph.
19

20 **PR-PUB-NLH-191** Reference: Hydro's Reply, page 7, lines 8-17. Please provide the data and
21 calculations supporting Hydro's claim that the \$477,647 amount is
22 "double counted" as part of Liberty's Holyrood Unit 1 supply-related cost
23 recommended disallowance.
24

25 **PR-PUB-NLH-192** Please reconcile the apparent discrepancy between the "Total Daily Costs"
26 listed on Table 1 of PR-PUB-NLH-133 and the source that is cited for that
27 data, PR-PUB-NLH-132, Attachment 1.
28

29 **Black Start**

30
31 **PR-PUB-NLH-193** Reference: Hydro's Reply, page 27, lines 6-9. Hydro stated that capital
32 costs of \$567,113 previously applied to the original Black Start Diesel
33 project have usefulness for the new CT's connection to the Holyrood
34 Plant. Please provide the supporting details for this amount including
35 specific descriptions of each expenditure included in the total amount and
36 the reasons for each expenditure.
37

38 **PR-PUB-NLH-194** Regarding the Hardwoods turbine, please provide (1) the periods in which
39 the unit was partially or fully unavailable between January 1, 2010 and the
40 present and (2) each occurrence when the unit failed to start when called
41 upon, including tests.
42

43 **PR-PUB-NLH-195** Reference: Hydro's Reply, page 27, line 18. Please provide documentation
44 supporting Hydro's statement that "the reason for moving the
45 Newfoundland Power mobile unit to Holyrood was to keep the ancillary
46 equipment at Holyrood in a warm state".

1 **Holyrood Unit 1 Turbine Failure**

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3 **PR-PUB-NLH-196** Reference: Hydro's Reply, page 30, lines 1-8 regarding common mode
4 failure. In the January 4, 2014 event, all three Holyrood units tripped at
5 09:05 and station service was unavailable until restored at 10:24. Does
6 Hydro believe this qualifies as isolation of the Holyrood Plant from the
7 system and a loss of offsite power event?
8

9 **PR-PUB-NLH-197** Please describe how adequate lube oil flow to the Holyrood turbines was
10 maintained during the January 4, 2014 9:05 trip.
11

12 **PR-PUB-NLH-198** Reference: Hydro's Reply, page 30, lines 1-8 regarding common mode
13 failure. At 15:38 on January 4, 2014, a number of lines were tripped,
14 including TL242. The latter, and hence station service, was restored at
15 16:09. Does Hydro believe this scenario qualifies as isolation of Holyrood
16 Plant from the system and a loss of offsite power event?
17

18 **PR-PUB-NLH-199** Reference: Hydro's Reply, page 30, lines 1-8 regarding common mode
19 failure. At 21:27 on January 5, 2014, Units 2 and 3 at the Holyrood Plant
20 tripped as well as TL242, with the latter restored at 22:19. Was this event
21 an isolation of the Holyrood Plant from the system and, if so, please
22 describe how adequate lube oil flow to the Holyrood Units 1 and 2
23 turbines was maintained.
24

25 **PR-PUB-NLH-200** Please provide the dates, up to and after January 11, 2013, on which
26 Holyrood Units 1 and 2 backup AC (South) lube oil pumps were called on
27 to supply adequate lube oil to the turbines and state the degree to which
28 they functioned properly.
29

30 **PR-PUB-NLH-201** Please provide the dates, up to and after January 11, 2013, on which
31 Holyrood Units 1 and 2 DC lube oil pumps were called on to supply
32 adequate lube oil to the turbines and indicate the degree to which they
33 functioned properly.
34

35 **Sunnyside Replacement Equipment**

36
37 **PR-PUB-NLH-202** Reference: Hydro's Reply, page 14, lines 8-13. Please provide the source
38 documents and calculation of the new SF6 breaker cost of \$527,740.
39

40 **PR-PUB-NLH-203** Reference: Hydro's Reply, page 14, lines 8-13. Please provide the source
41 documents and calculations showing that the costs of the new SF6 breaker
42 are included in Sunnyside Net Capital as set out in Table 5.3 of the Final
43 Report.

1 **2014 Revenue Deficiency**

2
3 **PR-PUB-NLH-204** Reference: Hydro's Reply, page 21, lines 10-25, and page 22, lines 1-7.
4 Please provide the invoices, other source documents and calculations
5 supporting Hydro's stated amounts of costs incurred by Hydro with
6 respect to each Phase 1 and Phase 2 of the Outage inquiry, costs incurred
7 with respect to each of the combined CT / Black Start Applications, the
8 Application for a Third Transmission Line from Bay D'Espoir to Western
9 Avalon, and fees in relation to Hydro's Application for the supply-related
10 costs.

11
12 **PR-PUB-NLH-205** Reference: Hydro's Reply, page 23, lines 1-6. Please provide the invoices,
13 other source documents and calculations supporting Hydro's assertion that
14 Stantec consulting expenses of \$335,900 are included in the Sunnyside
15 replacement equipment 2014 net operating expenses.

16
17 **PR-PUB-NLH-206** Reference: Hydro's Reply, page 23, lines 1-6. Please confirm that Hydro,
18 in the response to PR-PUB-NLH-152, Revision 1, June 17, 2015
19 designated the \$335,900 as only "Consultants" under Operating Expenses,
20 and that Liberty did not receive any information from Hydro that this
21 amount duplicated any amounts included in 2014 actual professional
22 services fees.

23
24 **PR-PUB-NLH-207** Reference: Hydro's Reply, page 23, lines 1-6. Please explain why 2014
25 actual professional service fees (Stantec Consulting fees, response to PR-
26 PUB-101) would be duplicated on Hydro's 2014 actual accounting records
27 as consulting operating expenses for Sunnyside (PR-PUB-NLH-152,
28 Revision 1), as asserted by Hydro?

29
30 **PR-PUB-NLH-208** Reference: Hydro's Reply, page 23, lines 7-11. Please provide the
31 invoices, other source documents and calculations showing that the
32 "\$13,400 for Toxicology & Chemistry Analysis" is not for Sunnyside
33 environmental remediation.

34
35 **PR-PUB-NLH-209** Reference: Stantec Consulting invoice #844286 for \$16,159.58 has
36 numerous entries for chemistry testing services in January and February
37 2014. Please provide invoices, supporting documents and other
38 information regarding the subject matter of this work, and whether the
39 services are related to the Outage Investigation or Sunnyside
40 environmental remediation

41
42 **Holyrood B1L17 Breaker**

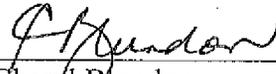
43
44 **PR-PUB-NLH-210** Reference: Hydro's Reply, page 17-19. Please provide documents
45 indicating Hydro's current procedure (subsequent to the failure of
46 Holyrood breaker B1L17 in January 2014) for protecting receiver tanks

1
2

from water contamination when air blast breakers are disassembled for the application of RTV coating on breaker insulators.

DATED at St. John's, Newfoundland this 20th day of August 2015.

BOARD OF COMMISSIONERS OF PUBLIC UTILITIES

Per 

Cheryl Blundon
Board Secretary