



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

2015-05-11

ELECTRONIC DISTRIBUTION

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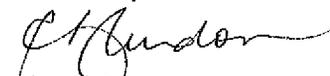
Dear Sir:

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

Enclosed are Information Requests PR-PUB-NLH-086 to PR-PUB-NLH-171 regarding the above-noted application. The deadline for filing the responses to the Requests for Information is Friday, May 22, 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

/cpj
Encl.

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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-086 to PR-PUB-NLH-171

Issued: May 11, 2015

- 1 **PR-PUB-NLH-086** Please provide paper copies and electronic copies of the “Overtime
2 Summary” of 2013 and 2014, including a breakdown by home based unit
3 division, operating and capital dollars, gross pay and hours, permanent
4 employee and temporary employee information, and variances between
5 2013 and 2014. Also provide the same broken down by monthly totals.
6
- 7 **PR-PUB-NLH-087** Please confirm that in the “Overtime Summary” for 2013 and 2014,
8 referenced in PR-PUB-NLH-086, the amounts provided tie to and
9 accurately reflect information contained in the 2014 Hydro regulated
10 financial statements, and that the amounts reflect a full, accurate and
11 complete listing of such overtime information.
12
- 13 **PR-PUB-NLH-088** Further to PR-PUB-NLH-086, please confirm that the information
14 provided in the “Overtime Summary” for 2013 and 2014 is identical to
15 that provided to Liberty over the course of the review of the January 2014
16 outages. If this is not the case, please identify and explain any differences.
17
- 18 **PR-PUB-NLH-089** Please provide electronic versions of 2011 and 2012 (both annual and
19 monthly) versions of the data described in PR-PUB-NLH-086, using a
20 similar format.
21
- 22 **PR-PUB-NLH-090** Please provide a copy of the Integrated Action Plan used in the discussions
23 between Hydro and Liberty with respect to the activities and costs
24 associated with the January 2014 outages.
25
- 26 **PR-PUB-NLH-091** Further to PR-PUB-NLH-090, please provide Hydro’s calculations and
27 breakdown by cost category of the components for the expenditures
28 associated with Hydro’s Integrated Action Plan items 13, 18, 19, 23, 29,
29 33, 34 and 49, as previously discussed with Liberty.
30
- 31 **PR-PUB-NLH-092** Further to the response to V-NLH-088 in the general rate case, regarding
32 Hydro’s treatment of the incremental costs related to the power outages in
33 2014, please provide 2014 actual information in the same format using
34 actual, audited information.
35
- 36 **PR-PUB-NLH-093** Please provide a summary of the outage costs listed in the response to V-
37 HLH-088 in the general rate case, incurred and recorded as regulated costs
38 in 2014, showing a breakdown by Hydro Generation, Thermal Generation,
39 Transmission and Rural Operations, and support departments.
40
- 41 **PR-PUB-NLH-094** Please provide a detailed breakdown of the “consulting costs” and
42 intercompany salary transfers to Hydro included in the response to PR-
43 PUB-NLH-092.
44
- 45 **PR-PUB-NLH-095** Please confirm that the intercompany salary transfers included in the
46 response to PR-PUB-NLH-092 and PR-PUB-NLH-094 do not include

1 engineering compensation costs for Project Engineering and Technical
2 Support personnel who performed 2014 outage-related work for Hydro.

3
4 **PR-PUB-NLH-096** Please provide the 2015 compensation costs for non-Hydro home based
5 Project Engineering and Technician Support personnel who worked on the
6 outages and did or should have charged time to Hydro.

7
8 **PR-PUB-NLH-097** Please provide the forecast included in the current rate case for insurance
9 proceeds associated with the Sunnyside Transformer Replacement and
10 provide the same information with 2014 actual, audited capital
11 expenditures, operating expenses (including depreciation) and insurance
12 proceeds.

13
14 **PR-PUB-NLH-098** Please provide a breakdown of the 2014 actual operating costs and
15 consulting costs that were included in the summary of the Sunnyside
16 Transformer Replacement Project referred to in the response to PR-PUB-
17 NLH-097.

18
19 **PR-PUB-NLH-099** Please confirm that Liberty requested that Hydro provide the total amounts
20 paid for professional services in 2014, and access to the supporting
21 invoices and work papers to review at Hydro's offices and that Hydro
22 provided the summary shown in the table below.

Regulated Hydro Professional Services	
Consultants	\$7,146,098
Audit	\$112,992
Legal	\$654
PUB Related Costs	\$3,814,860
Software	\$1,554,549
Total Regulated Hydro	\$12,629,153

23 **PR-PUB-NLH-100** Further to PR-PUB-NLH-099 please confirm that the amounts shown in
24 the table tie to and accurately reflect information contained in Hydro's
25 2014 regulated financial statements, and that the amounts reflect a full,
26 accurate, and complete listing of professional services costs.

27
28 **PR-PUB-NLH-101** Please provide copies of the 12-page and 4-page summaries of Hydro's
29 2014 Professional Services which were reviewed by Liberty at Hydro's
30 office.

31
32 **PR-PUB-NLH-102** Further to PR-PUB-NLH-101 please confirm that the amounts used tie to
33 and accurately reflect information contained in Hydro's 2014 regulated
34 financial statements, and that the amounts reflect a full, accurate, and
35 complete listing of 2014 consultant costs exceeding \$10,000.

- 1 **PR-PUB-NLH-103** Please provide the date when the 8x2 MW diesel black start capability was
2 in service and the date when it no longer was necessary due to completion
3 of the new CT.
4
- 5 **PR-PUB-NLH-104** Please identify all occasions on which any of the 8x2 MW diesel units
6 were unavailable during the period prior to new CT availability.
7
- 8 **PR-PUB-NLH-105** Please identify all occasions on which black start was unavailable at any
9 time after the 8x2 MW diesel units first became available and prior to new
10 CT availability and explain the reasons for such unavailability.
11
- 12 **PR-PUB-NLH-106** Please refer to the response to PUB-NLH-013, Attachment 3, filed in
13 Hydro's Holyrood Blackstart Diesel Units Application, which starts with,
14 "Here is note from Terry Ledrew and John MacIsaac's response. This is
15 not surprising but nevertheless a concern for the Avalon and Holyrood's
16 security. If we lose transmission supply to Holyrood we will not be able to
17 get the plant started to begin restoration." The remaining material in the
18 attachment does not address this security concern. Please clarify and
19 explain the concern.
20
- 21 **PR-PUB-NLH-107** The response to NP-NLH-018 in Hydro's Holyrood Blackstart Application
22 (the Blackstart Application) states that all 8 of the 2 MW temporary black
23 start diesels must be running to support the startup of a boiler feed pump.
24 In its December 2011 report filed as attachment 1 to NP-NLH-022 in the
25 Blackstart Application, AMEC stated 5 X 2 MW diesels was a viable
26 option. Please explain this apparent discrepancy, and describe whether, in
27 retrospect, all the AMEC recommended options were inadequate.
28
- 29 **PR-PUB-NLH-108** Please provide the estimated reliability, in terms of failure to start or other
30 appropriate measure, of each of the 8 diesel generators that form part of
31 the black start system.
32
- 33 **PR-PUB-NLH-109** Please provide the estimated reliability, using the same measures as in the
34 response to PR-PUB-NLH-108, of the black start system as a whole
35 during use of the 8 diesel generators.
36
- 37 **PR-PUB-NLH-110** The response to NP-NLH-018 in Hydro's Holyrood Blackstart Application
38 suggests that required black start capability will be lost upon the failure of
39 one of the diesels and that contingency plans with resulting delays will be
40 required for such an event. Please explain Hydro's basis for selecting an
41 option that will not meet the design intent if even one of eight components
42 fails and describe whether one or more additional units was considered for
43 backup.
44
- 45 **PR-PUB-NLH-111** The response to PUB-NLH-029 in Hydro's Holyrood Blackstart
46 Application (the "Application") states that the Newfoundland Power

1 mobile unit was moved to Holyrood to bolster capacity on the Avalon
 2 Peninsula, implying that its use to provide black start capability was an
 3 after-thought. The report filed with the Application, at Page 4, states that,
 4 "In recognition of this delay in restart caused by the lack of local
 5 blackstart generation, Hydro immediately requested Newfoundland Power
 6 to station two of its mobile generators at the Holyrood site." Please clarify
 7 the timing and rationale for using the mobile unit for black start capability
 8 and explain that answer in the context of the preface to this RFI.
 9

10 **PR-PUB-NLH-112** Explain why the Newfoundland Power mobile unit was considered for
 11 black start capability and how it meets black start needs, given that its
 12 capacity (7.5 MW) was well below any of the previously proposed
 13 solutions.
 14

15 **PR-PUB-NLH-113** Please provide the Hardwoods black start actual, audited 2014 capital and
 16 operating costs for 2014. Please provide the Hardwoods black start
 17 accounting records, descriptions and all related work papers.
 18

19 **PR-PUB-NLH-114** Please provide the Hardwoods black start capital and operating cost
 20 estimates included in the 2015 test period in the current rate case, and all
 21 revisions to that data to date, and provide all related descriptions and work
 22 papers for 2015 and any revisions.
 23

24 **PR-PUB-NLH-115** Please provide the capital and operating costs of moving the
 25 Newfoundland Power mobile unit from the West Coast and operating the
 26 unit in 2014, and the Newfoundland Power mobile unit moving and
 27 operations accounting records, descriptions and all related work papers.
 28

29 **PR-PUB-NLH-116** Please provide the Newfoundland Power mobile unit capital and operating
 30 cost estimates included in the 2015 test period in the current rate case (if
 31 any), and all revisions to that data to date, including all related
 32 descriptions and work papers for 2015 and any revisions.
 33

34 **PR-PUB-NLH-117** Please provide any industry data compiled by Hydro that verifies that the
 35 cost of the new CT is reasonable when compared with the \$/kw cost of
 36 similar plants.
 37

38 **PR-PUB-NLH-118** It appears that the final cost of the new CT is about half the cost (on a
 39 \$/kw basis) of the originally planned 60 MW unit; please explain this
 40 apparent discrepancy, explaining all reasons for the lower cost/kw of the
 41 larger CT.
 42

43 **PR-PUB-NLH-119** Please describe whether and how industry data supports the cost of the
 44 new CT and provide the basis for the cost estimate for the 60 MW CT
 45 Unit considered by Hydro.

- 1 **PR-PUB-NLH-120** The Generation Planning Issues Report of 2012 (Appendix C of Hydro's
2 Application for Approval of the Project to Supply and Install 100 MW
3 Combustion Turbine) states on Page 15 that, "It should be noted that the
4 capacity deficits trigger the need for the next generation source by late
5 2014 under the current planning criteria to avoid exceeding the LOLH
6 limits in 2015." Yet it appears that the new CT had always been planned
7 for late 2015, not late 2014. Please explain the basis for this decision and
8 the rationale for not planning a late 2014 installation.
9
- 10 **PR-PUB-NLH-121** Please provide the new CT capital and operating costs in actual, audited
11 accounting data, descriptions and all related work papers for 2014.
12
- 13 **PR-PUB-NLH-122** Please provide the new CT capital and operating expense estimates
14 included for the 2015 test period in the current rate case, all revisions to
15 that data to date, and all related descriptions and work papers for 2015 and
16 any revisions.
17
- 18 **PR-PUB-NLH-123** The response to PR-PUB-NLH-010 states that Unit 1 at the Holyrood
19 Plant meets ISO-7919-2 guidelines for unrestricted, long-term operation.
20 Please provide the 2014 vibration measurements that are within Zone B of
21 the guideline that justify unrestricted, long-term operations.
22
- 23 **PR-PUB-NLH-124** Further to PR-PUB-NLH-123, please provide and describe the vibration
24 measurements for Unit 1 at the Holyrod Plant observed during 2013.
25
- 26 **PR-PUB-NLH-125** Please confirm that a structural engineer considered the effects of
27 Holyrood Unit 1 2013 vibrations transmitted to the structure or
28 foundation. If yes, provide a copy of that engineer's report and if no,
29 explain why not.
30
- 31 **PR-PUB-NLH-126** Does Hydro consider that a design of the emergency diesel generator
32 scheme in which the unit does not start under degraded voltage conditions
33 (brownout), but only on complete loss of power (blackout), is "standard
34 industry practice"? If yes, provide all the documentation on which Hydro
35 relies for this position.
36
- 37 **PR-PUB-NLH-127** In Hydro's root cause analysis of the 2013 Unit 1 lube oil failure filed as
38 part of Hydro's 2013 supplemental capital budget application for the
39 project, an incorrectly set resistor (Page 9) and a vendor QA/QC oversight
40 failure (Page 10) were identified as root causes. Please explain the role
41 these two factors contributed in the system failure and the degree to which
42 they were or were not major contributors.
43
- 44 **PR-PUB-NLH-128** Please identify the operating costs for replacement power during the 2013
45 outage of Unit 1 at the Holyrood Plant following the lube oil failure event.

- 1 **PR-PUB-NLH-129** Please provide all 2014 capital and operating costs associated with the
2 2013 Holyrood Unit 1 outage, including all replacement power, using
3 actual, audited accounting data and including all related work papers.
4
- 5 **PR-PUB-NLH-130** Please provide any 2013 Holyrood Unit 1 outage capital and operating
6 costs included in the 2015 test period in the current rate case, all revisions
7 to that data to date, and all related descriptions and work papers for 2015
8 and any revisions.
9
- 10 **PR-PUB-NLH-131** Please provide all Holyrood Unit 1 2013 outage costs passed to customers
11 through fuel clauses or other rate mechanisms in 2013 and 2014.
12
- 13 **PR-PUB-NLH-132** For each day in 2014 for which Hydro is requesting added supply-related
14 costs, please provide the following information:
15
 - Generating units / MW unavailable
 - Temperature variable
 - Peak load
 - Source, MWh, and cost of replacement power.
19
- 20 **PR-PUB-NLH-133** Further to PR-PUB-NLH-132, please provide those specifically
21 attributable to the de-rate of Holyrood Unit 3 due to the failed FD fan
22 motor.
23
- 24 **PR-PUB-NLH-134** Please provide Hydro's analysis of the degree to which the added supply
25 costs of 2014 should be considered atypical, specifically addressing the
26 number and nature of unit outages versus other years and weather
27 conditions and explain their impact on load.
28
- 29 **PR-PUB-NLH-135** Please confirm that Hydro's reliability criterion of 2.8 LOLH has been
30 used for many years, provide an estimate of the duration of that period,
31 and confirm that the forced outage rates used in Strategist have been
32 modified from time-to-time as Hydro believed such modifications were
33 appropriate.
34
- 35 **PR-PUB-NLH-136** Please provide, dating back to at least 1998:
36
 - The changes in forced outage rates used in the Strategist model as a
37 function of time
 - The reasons why such changes were thought to be appropriate
 - The equivalent reserve requirement corresponding to the 2.8 LOLH for
38 each new set of forced outage rates employed
 - Any associated notifications to the Public Utilities Board regarding
39 such changes or the impacts on reserves.
43
- 44 **PR-PUB-NLH-137** Please provide all 2014 costs associated with agreements with Corner
45 Brook Pulp and Paper to provide capacity, using actual, audited
46 accounting data, and providing descriptions and all related work papers.

- 1 **PR-PUB-NLH-138** Please provide any 2015 estimated costs included in the current rate case
2 associated with agreements with Corner Brook Pulp and Paper to provide
3 capacity, including all related descriptions and work papers.
4
- 5 **PR-PUB-NLH-139** Please provide all 2014 costs associated with Hydro using additional
6 diesel and gas turbine generation, plus incurred costs for requesting
7 Newfoundland Power to run its thermal generation, using actual, audited
8 accounting data, and providing descriptions and all related work papers.
9
- 10 **PR-PUB-NLH-140** Please provide any 2015 estimated costs included in the current rate case
11 associated with Hydro using additional diesel and gas turbine generation,
12 plus incurred costs for requesting Newfoundland Power to run its thermal
13 generation, providing all related descriptions and work papers.
14
- 15 **PR-PUB-NLH-141** Please provide the records identifying all incremental 2014 and 2015 costs
16 to date and included in the costs addressed in PR-PUB-NLH-137 through
17 PR-PUB-NLH-140 that have been recovered from customers through fuel
18 clauses or other rate adjustment mechanisms.
19
- 20 **PR-PUB-NLH-142** Please confirm that an AMEC 2011 condition assessment of the Holyrood
21 Plant concluded that the FD fan motor had a limited remaining life and
22 was not likely to survive until the retirement of the Holyrood Plant.
23
- 24 **PR-PUB-NLH-143** Please describe why Hydro made no efforts to replace FD fan motors at
25 the Holyrood Plant and confirm a “run to failure” approach was followed
26 by Hydro.
27
- 28 **PR-PUB-NLH-144** Please confirm that in preparation for the winter of 2014-15, “spare” FD
29 Fan motors were procured for the Holyrood Plant and that no plan existed
30 to replace the FD fan motors.
31
- 32 **PR-PUB-NLH-145** Please explain why Hydro did not believe the procurement of new FD fan
33 motors was appropriate after the AMEC conclusions in 2011 and why a
34 “run to failure” strategy was deemed appropriate.
35
- 36 **PR-PUB-NLH-146** Please state each occasion after the AMEC 2011 condition assessment of
37 the Holyrood Plant when new FD fan motors were included in a proposed
38 annual budget. In the reference identify the motors, the year of the budget,
39 the budgeted amount and the eventual disposition of the budget item.
40
- 41 **PR-PUB-NLH-147** Please provide all 2014 capital and operating costs associated with the
42 failure of the Holyrood Unit 3 FD Fan Motor, using actual, audited
43 accounting data, and providing descriptions and all related work papers.

- 1 **PR-PUB-NLH-148** Please provide any 2015 estimated costs included in the current rate case
2 associated with the failure of the Holyrood Unit 3 FD Fan Motor and
3 provide all related descriptions and work papers.
4
- 5 **PR-PUB-NLH-149** A lack of confidence in temporary mobile generation at Black Tickle
6 seems to have been a basis for expediting the permanent solution for the
7 diesel plant. Please provide the basis for Hydro's lack of confidence.
8
- 9 **PR-PUB-NLH-150** Please provide Hydro's actual experience with mobile diesel generating
10 units in isolated rural areas compared with other sources of supply in
11 diesel areas.
12
- 13 **PR-PUB-NLH-151** A reduction in capacity of the Black Tickle diesel plant would likely have
14 produced a cost savings and a delay in returning the plant to its normal
15 service. Please provide Hydro's estimates of both the cost savings and the
16 schedule penalty of such capacity reduction.
17
- 18 **PR-PUB-NLH-152** Please provide the Sunnyside Replacement Equipment actual, audited
19 accounting data, descriptions, and all related work papers for 2014,
20 addressing capital expenditures, per account/subaccount number
21 indicating labor and materials separately, operating costs, depreciation and
22 rate base.
23
- 24 **PR-PUB-NLH-153** Please provide and explain the impacts of insurance proceeds, insurance
25 deductibles, and any other adjustments of 2014 actual capital
26 expenditures, operating costs, income statement, and rate base associated
27 with Sunnyside Replacement Equipment.
28
- 29 **PR-PUB-NLH-154** Please provide the Sunnyside Replacement Equipment estimates per
30 account/subaccount number indicating labor and materials separately,
31 included in the 2015 test period in the current rate case (and all revisions
32 to date), including descriptions and work papers, and addressing capital
33 expenditures, operating costs, depreciation, and rate base.
34
- 35 **PR-PUB-NLH-155** Please provide and explain the impacts of insurance proceeds, insurance
36 deductibles, and any other adjustments on 2015 test period Sunnyside
37 Replacement Equipment capital expenditures, operating costs, income
38 statement, and rate base.
39
- 40 **PR-PUB-NLH-156** Further to the response to PR-PUB-NLH-035, please provide the Western
41 Avalon Tap Changer Replacement actual audited accounting data,
42 expenses per account/subaccount number, indicating labor and materials
43 separately, descriptions, and all related work papers for 2014, addressing
44 capital expenditures, operating costs, depreciation, and rate base.

- 1 **PR-PUB-NLH-157** Please provide and explain the impacts of insurance proceeds, insurance
2 deductibles and any other adjustments on Western Avalon Tap Changer
3 Replacement 2014 actual capital expenditures, operating costs, income
4 statement, and rate base.
5
- 6 **PR-PUB-NLH-158** Please provide the West Avalon Tap Changer Replacement estimates
7 included in the 2015 test period in the current rate case (and all revisions
8 to date), including descriptions and work papers, and addressing capital
9 expenditures per account/subaccount number indicating labor and
10 materials separately, operating costs, depreciation and rate base.
11
- 12 **PR-PUB-NLH-159** Please provide and explain the impacts of insurance proceeds, insurance
13 deductibles and any other adjustments on West Avalon Tap Changer
14 Replacement 2015 test period capital expenditures, operating costs,
15 income statement, and rate base.
16
- 17 **PR-PUB-NLH-160** Further to the response to PR-PUB-NLH-037, please provide the
18 Sunnyside and Holyrood breaker overhauls actual, audited accounting
19 data, per account/subaccount number, indicating labor and materials
20 separately, descriptions, and all related work papers for 2014, addressing
21 capital expenditures, operating costs, depreciation, and rate base.
22
- 23 **PR-PUB-NLH-161** Please provide and explain the impacts of insurance proceeds, insurance
24 deductibles and any other adjustments on Sunnyside and Holyrood breaker
25 overhauls 2014 actual capital expenditures, operating costs, income
26 statement, and rate base.
27
- 28 **PR-PUB-NLH-162** Please provide the estimates per account/subaccount number indicating
29 labor and materials separately, for Sunnyside and Holyrood breaker
30 overhauls included in the 2015 test period in the current rate case (and
31 revisions to date), including all related descriptions and work papers, and
32 addressing capital expenditures, operating costs, depreciation, and rate
33 base.
34
- 35 **PR-PUB-NLH-163** Please provide and explain the impacts of insurance proceeds, insurance
36 deductibles and any other adjustments on Sunnyside and Holyrood breaker
37 overhauls 2015 test period capital expenditures, operating costs, income
38 statement, and rate base.
39
- 40 **PR-PUB-NLH-164** Further to the response to PR-PUB-NLH-039, please provide the Labrador
41 City project's actual, audited accounting data, descriptions and all related
42 work papers for 2009 through 2014, addressing capital expenditures per
43 account/subaccount number indicating labor and materials separately,
44 operating costs, depreciation, and rate base.

- 1 **PR-PUB-NLH-165** Please provide the Labrador City project's actuals or estimates per
 2 account/subaccount number indicating labor and materials separately,
 3 included in the 2015 test period in the current rate case (and all revisions
 4 to date), including all related descriptions and work papers, and addressing
 5 capital expenditures, operating costs, depreciation, and rate base.
 6
- 7 **PR-PUB-NLH-166** With respect to work under the six-year maintenance cycle that was about
 8 three months overdue when the Sunnyside T1 transformer failed, please
 9 provide any documentation (existing before the January 2014 incidents)
 10 stating and describing when Hydro scheduled the deferred work
 11 performance.
 12
- 13 **PR-PUB-NLH-167** Please provide by voltage, the numbers of air blast circuit breakers
 14 overdue for 6-year maintenance at the end of each year 2007 through
 15 2013.
 16
- 17 **PR-PUB-NLH-168** Please provide a list for each air blast circuit breaker of the dates on which
 18 Hydro completed the two most recent 6-year maintenance activities.
 19
- 20 **PR-PUB-NLH-169** Please provide the numbers of terminal station transformers overdue for 6-
 21 year maintenance at the end of each year 2007 through 2013.
 22
- 23 **PR-PUB-NLH-170** Please provide for each terminal station the dates on which Hydro
 24 completed the two most recent 6-year maintenance activities.
 25
- 26 **PR-PUB-NLH-171** Further to the response to PR-PUB-NLH-074, page 2, please confirm that
 27 the 2 to 8 year breaker maintenance frequency provided by Canadian
 28 utilities was for ABCBs and not for all types of breakers.

DATED at St. John's, Newfoundland this 11th day of May 2015.

BOARD OF COMMISSIONERS OF PUBLIC UTILITIES

Per


 Cheryl Blundon
 Board Secretary