

DANNY DUMARESQUE
213 Portugal Cove Road
St. John's, NL A1B 2N5

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2015-08-17

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

Dear Sirs:

RE: A General Rate Application filed by Newfoundland and Labrador Hydro November 10, 2014 and a Prudence Review to certain actions and costs of Newfoundland and Labrador Hydro – Request for Information

Enclosed are Information Requests PR-DD-NLH-001 to PR-DD-NLH-018 regarding the above-noted matter.

If you have any questions, please do not hesitate to contact me, via email danny.liberal@gmail.com or (709) 685-5719.

Sincerely yours,

Danny Dumaresque
Intervenor

Encl.

cc.

NEWFOUNDLAND POWER INC.

Mr. Gerard Hayes, E-Mail: ghayes@newfoundlandpower.com

Ian Kelly, QC, E-Mail: ikelly@curtisdawe.com

CONSUMER ADVOCATE

Mr. Thomas Johnson, E-Mail: tjohnson@odeaearle.ca

Ms. Colleen Lacey, E-Mail: clacey@odeaearle.ca

ISLAND INDUSTRIAL CUSTOMER GROUP

Mr. Paul Coxworthy, E-Mail: pcoxworthy@stewartmckelvey.com

Mr. Dean Porter, E-Mail: dporter@pa-law.ca

PUBLIC UTILITIES BOARD

Ms. Cheryl Blundon, E-Mail: cblundon@pub.nl.ca

Ms. M. Greene, E-Mail: mgreene@pub.nl.ca

Mr. Fred Winsor, E-Mail: winsorf@nl.rogers.com

Mr. Tom O'Reilly, E-Mail: toreilly@coxandpalmer.com

1 **IN THE MATTER OF**
2 the *Electrical Power Control Act, 1994*,
3 SNL 1994, Chapter E-5.1 (the “*EPCA*”)
4 and the *Public Utilities Act*, RSNL 1990,
5 Chapter P-47 (the “*Act*”), as amended; and
6 Regulations thereunder; and
7
8 **IN THE MATTER** of a general rate application filed by Newfoundland and
9 Labrador Hydro on November 10, 2014; and
10
11 **IN THE MATTER OF** a prudence review to certain actions and costs of
12 Newfoundland and Labrador Hydro.

DANNY DUMARESQUE
REQUESTS FOR INFORMATION
PR-DD-NLH-001 to PR-DD-NLH-018
Issued: August 18, 2015

- 1 **PR-DD-NLH-001** Please provide the new CT capital costs to date in actual, audited
2 accounting data, descriptions and all related work papers to date. Please
3 separate the Owner's costs from the Contract.
4
- 5 **PR-DD-NLH-002** Please provide copies of all consultants contracts which contributed to the
6 \$1,342,848 shown in response to PR-PUB-NLH-121.
7
- 8 **PR-DD-NLH-003** Please provide a breakdown of all travel costs and which employees of
9 Nalcor/ Hydro who undertook this travel totaling \$124,923 as shown in
10 response to PR-PUB-NLH-121.
11
- 12 **PR-DD-NLH-004** Please identify the employees and their positions who were involved in the
13 search and identification of the CT, including who went to investigate the
14 package and when this investigation took place.
15
- 16 **PR-DD-NLH-005** Please provide a daily record of the operation of the new CT to date
17 showing the MWs produced, fuel consumed and cost of this fuel.
18
- 19 **PR-DD-NLH-006** Please provide a copy of any operating and maintenance contract you have
20 for the new CT and the total operating costs in actual, audited accounting
21 data, descriptions and all related work to date.
22
- 23 **PR-DD-NLH-007** Please provide the names and positions of the employees who were
24 involved in the direct negotiation of the purchase of this CT, where such
25 meetings were held and copies of any offers or counteroffers made to the
26 Seller of this unit.
27
- 28 **PR-DD-NLH-008** Please provide copies of any independent third party Appraisal done
29 attesting to the fair market value of this CTG package.
30
- 31 **PR-DD-NLH-009** Please provide documentation showing clear legal title to this CT and when
32 this ownership was secured.
33
- 34 **PR-DD-NLH-010** Please provide the contract for the extended (two year) warranty and any
35 reports which verify that this is the same or equal to a Manufacturer's
36 Warranty.
37
- 38 **PR-DD-NLH-011** Please provide documentation of any legal actions such as lawsuits,
39 between NL Hydro and/or the Contractor of this project and any other
40 parties.
41
- 42 **PR-DD-NLH-012** Please explain why the CT was offline and unavailable at any time this
43 year, including any reports or work orders associated with such times.
44
- 45 **PR-DD-NLH-013** Please provide a breakdown of the operating and maintenance positions
46 and if these positions are all filled by residents of this province.

- 1 **PR-DD-NLH-014** Please provide the name and position of the employee who discovered this
2 CTG, when and how this discovery took place.
3
- 4 **PR-DD-NLH-015** Please provide the names and positions of the employees who have been
5 working with a Mr. Kerry McDonough, Area Sales Manager PW Power
6 Systems, Inc., the nature of this work and please provide any
7 correspondence, reports, presentations or any associated materials between
8 Nalcor and/or NL Hydro and Mr. McDonough and/or his company PW
9 Power Systems, A group company of Mitsubishi Heavy Industries, LTD.
10
- 11 **PR-DD-NLH-016** Please provide the name(s) and positions of the employees who assessed
12 the bids resulting from the Tender Process for this new capacity closing
13 April 21, 2014.
14
- 15 **PR-DD-NLH-017** Please provide any correspondence you may have had with any US legal
16 authorities concerning ProEnergy Services Inc.
17
18

DATED at St. John's, Newfoundland this 18th day of August, 2015.

Per _____
Danny Dumaresque,
Intervenor