

September 15, 2015

Ms. G. Cheryl Blundon
Director of Corporate Services and Board Secretary
Board of Commissioners of Public Utilities
120 Torbay Road
P.O. Box 21040
St. John's, NL A1A 5B2

Dear Ms. Blundon:

Re: Newfoundland and Labrador Hydro Application

Supplemental Capital Expenditure – Hardwoods Gas Turbine

Requests for Information of the Consumer Advocate

In relation to the above noted application please find enclosed the original and twelve (12) copies of the Consumer Advocate's Requests for Information numbered CA-NLH-01 to CA-NLH-06.

A copy of the letter, together with enclosures, 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,

MITA

THOMAS JOHNSON Q.C.

Encl.

cc: Newfoundland & Labrador Hydro

Attention: Geoffrey P. Young, Senior Legal Counsel

Newfoundland Power

Attention: Gerard Hayes, Senior Legal Counsel

Industrial Customers

Attention: Paul Coxworthy/Dean Porter

Dated at St. John's in the Province of Newfoundland and Labrador, this 15th day of September,

2 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

IN THE MATTER OF

the *Public Utilities Act*, RSNL 1990, Chapter P-47 (the "Act"), as amended;

AND

IN THE MATTER OF

an Application by Newfoundland and Labrador Hydro, for an Order approving: (1) The proposed capital expenditure of \$1,249,300.00 to refurbish gas turbine engine serial number 202224 located at Hardwoods Gas Turbine Plant, pursuant to s. 41(3) of the Act; and (2) that Hydro shall pay all expenses of the Board.

CONSUMER ADVOCATE REQUESTS FOR INFORMATION CA-NLH-01 to CA-NLH-07 Issued: September 15, 2015

What is the basis for stating that the fire event was caused by the failure of a CA-NLH-01 1 pressure relief line in the fuel system within the engine module (p. 6, line 4)? 2 3 CA-NLH-02 How old was the pressure relief line in the fuel system? 4 5 When was the pressure relief line last inspected and/or tested? Please provide a CA-NLH-03 6 copy of the inspection/testing results and a copy of any report detailing follow up 7 work carried out as a result. 8 9 CA-NLH-04 What is the accepted utility standard in terms of frequency of inspections and 10 testing? 11 12 When did Alba Power visit the site and assess the damage (p. 5, line 8-9)? CA-NLH-05 13 14 Please provide Alba Power's report(s) to Hydro concerning its work in relation to CA-NLH-06 15 16 the engine. 17 CA-NLH-07 Have either of Hydro's gas turbine plants had similar pressure relief line failures? 18 19