

September 15, 2015

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Via Electronic Mail and Courier

Newfoundland and Labrador Board
of Commissioners of Public Utilities
120 Torbay Road
P.O. Box 21040
St. John's, NL A1A 5B2

**Attention: Ms. G. Cheryl Blundon, Director of Corporate Services
and Board Secretary**

Dear Ms. Blundon:

**Re: Newfoundland and Labrador Hydro Application – Supplemental Capital
Expenditure – Hardwoods Gas Turbine -
Requests for Information of the Island Industrial Customers**

Please find enclosed the original and twelve (12) copies of the Requests for Information IC–
NLH–1 to IC–NLH–4 of the Island Industrial Customers in the above Application.

We trust you will find the enclosed to be in order.

Yours truly,

Stewart McKelvey



Paul L. Coxworthy

PLC/kmcd

Enclosure

- c. Geoffrey P. Young, Senior Legal Counsel, Newfoundland and Labrador Hydro
Thomas J. Johnson, Consumer Advocate
Gerard Hayes, Newfoundland Power
Dean A. Porter, Poole Althouse

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.

REQUESTS FOR INFORMATION OF THE ISLAND INDUSTRIAL CUSTOMERS GROUP

SEPTEMBER 15, 2015

Application for approval of the Hardwoods Gas Turbine Engine Refurbishment

IC-NLH-1 Is there currently any information available, gathered through preliminary investigations or otherwise, relating to the cause of the fire occurring on March 1, 2015 in engine module B at Harwoods Gas Turbine Plant ("Harwoods")?

IC-NLH-2 Did engine serial number 202224 have insurance coverage on the date of the fire? If so, please provide a copy of the insurance policy pertaining to engine serial number 202224 with specific reference to the policy's terms of coverage which may include, but may not be limited to, claims caused by fires, electricity, lightning, smoke, and explosions.

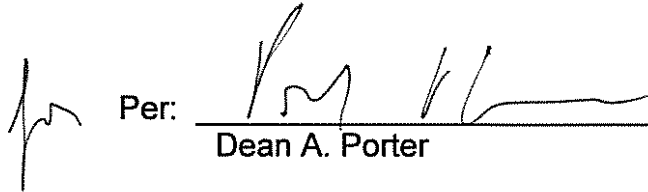
IC-NLH-3 Was engine serial number 202224 under a valid manufacturer's warranty on the date of the fire? If so, please provide a copy of the warranty, including all terms and exclusions.

August 2015 Hardwoods Gas Turbine Engine Refurbishment Report

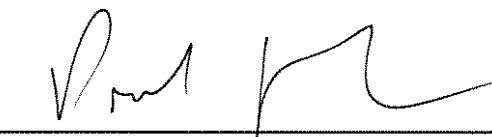
IC-NLH-4 On page 6 on the report, it notes that a replacement engine has been installed in place of engine 202224 while it is being refurbished, "...making Hardwoods available at reduced capacity". Please state the capacity of Hardwoods since the replacement engine has been installed.

DATED at St. John's, in the Province of Newfoundland and Labrador, this 14th day of September, 2015.

POOLE ALTHOUSE

Per: _____
Dean A. Porter

STEWART MCKELVEY

Per: _____
Paul L. Coxworthy

TO: The Board of Commissioners of Public Utilities
Suite E210, Prince Charles Building
120 Torbay Road
P.O. Box 21040
St. John's, NL A1A 5B2

Attention: Board Secretary

TO: Newfoundland & Labrador Hydro
P.O. Box 12400
500 Columbus Drive
St. John's, NL A1B 4K7

Attention: Geoffrey P. Young,
Senior Legal Counsel

TO: Thomas Johnson, Consumer Advocate
O'Dea, Earle Law Offices
323 Duckworth Street
St. John's, NL A1C 5X4

TO: Newfoundland Power Inc.
P.O. Box 8910
55 Kenmount Road
St. John's, NL A1B 3P6

Attention: Gerard Hayes,
Senior Legal Counsel