



October 20, 2014

Ms. G. Cheryl Blundon  
Board of Commissioners of Public Utilities  
120 Torbay Road, P.O. Box 12040  
St. John's, NL A1A 5B2

Ladies & Gentlemen:

**Re: Newfoundland and Labrador Hydro Application for Approval of Additional 2014 and 2015  
Capital Expenditures for the Labrador City Voltage Project**

In relation to the above noted, please find enclosed the original and twelve (12) copies of:

1. The Consumer Advocate's Intervenor's Submission; and
2. Requests for Information CA-NLH-1 to CA-NLH-9.

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

Yours very truly,

  
O'DEA EARLE

THOMAS JOHNSON

TJ/cel

Encl.

cc: Newfoundland and Labrador Hydro  
Attention: Geoffrey P. Young

Newfoundland Power  
Attention: Gerard Hayes,

Island Industrial Customers Group  
Attention: Mr. Paul Coxworthy (Stewart McKelvey)

Vale Newfoundland and Labrador Limited  
Attention: Mr. Thomas O'Reilly, Q.C. (Cox & Palmer)

Praxair Canada Inc.  
Attention: Ms. Sheryl Nisenbaum

**IN THE MATTER OF**

the *Electrical Power Control Act, 1994*, R.S.N.L. 1994,  
Chapter E-5.1 (the "*EPCA*") and the *Public Utilities Act*,  
R.S.N.L. 1990, Chapter P-47 (the "*Act*"), and regulations thereunder;

AND

**IN THE MATTER OF**

an Application by Newfoundland and Labrador Hydro  
(Hydro) pursuant to Subsections 41(1) and 41(3) of the  
*Act*, for approval of additional capital expenditures  
Pertaining to its Labrador City Voltage Upgrade  
Multi-year Project

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**CONSUMER ADVOCATE  
REQUESTS FOR INFORMATION  
CA-NLH-1 to CA-NLH-9**

**Issued: October 20, 2014**

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CA-NLH-1

(Re: September 2014 Report submitted as part of Application) It is stated (page 3 lines 21 to 22): “*The scope of the project and continued load growth was underestimated and contributed to increased costs due to a higher quantity of materials than budgeted*”. Please identify the specific changes in the project scope since the project was initially approved and provide an explanation of the cost increase owing to each change in scope.

CA-NLH-2

(Re: September 2014 Report submitted as part of Application) It is stated (page 3 lines 21 to 22): “*The scope of the project and continued load growth was underestimated and contributed to increased costs due to a higher quantity of materials than budgeted*”. Please explain how load growth resulted in increased costs and a higher quantity of materials than initially budgeted.

CA-NLH-3

(Re: September 2014 Report submitted as part of Application) It is stated (page 4 line 15): “*The outage restrictions have also contributed to the requirement for a schedule extension*”. Please provide a table identifying the time and date of each outage relating to this project, the number of customers affected, the outage duration, and the number of customer complaints arising from each outage. In addition, please identify the number and duration of forecast outages going forward through to project end along with the number of customers affected.

CA-NLH-4

(Re: September 2014 Report submitted as part of Application) It is stated (page 4 lines 20 to 21): “*As part of the review, a construction work plan was developed and approved by both Project Execution and Hydro Operations in Labrador*”. Please file copies of the original construction work plan and the new

1 construction work plan that received approval by both Project  
2 Execution and Hydro Operations in Labrador.

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4 CA-NLH-5 (Re: September 2014 Report submitted as part of Application, page  
5 5, Table 1) Table 1 shows a significant increase of about 75% in  
6 material supply costs from the original budget amount. Please  
7 provide a complete breakdown of the material supply costs  
8 comparing original budget amounts to current project cost  
9 estimates along with an explanation of why the cost has increased.

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11 CA-NLH-6 (Re: September 2014 Report submitted as part of Application, page  
12 5, Table 1) Table 1 includes other direct costs of \$0 in the original  
13 budget and \$719,500 in the current project cost estimate. Please  
14 provide a complete breakdown of the other direct costs and explain  
15 why there were no such costs included in the original budget.


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17 CA-NLH-7 (Re: September 2014 Report submitted as part of Application, page  
18 5, Table 1) What level of accuracy was the original project budget,  
19 and what level of accuracy is the current project cost estimate?

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21 CA-NLH-8 (Re: September 2014 Report submitted as part of Application, page  
22 5, Table 1) What was the basis for the \$768,000 contingency in the  
23 original budget, and what is the basis for the \$335,200 contingency  
24 in the current project cost estimate?

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26 CA-NLH-9 (Re: September 2014 Report submitted as part of Application, page  
27 5, lines 10 to 12) It is stated "*As demonstrated in the 2010 capital  
28 budget proposal, voltage conversion is the most efficient and  
29 economical way to obtain these desired results*". Would this have  
30 been the case had Hydro assessed the project in the 2010 capital  
31 budget proposal based on the current project cost estimate? Please

provide supporting documentation.

Dated at St. John's in the Province of Newfoundland and Labrador, this 20<sup>th</sup> day of October, 2014.

A handwritten signature in black ink, appearing to read 'T. Johnson', written over a horizontal line.

Thomas Johnson  
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