1	Q.	Tab D; Volume 1: Capital Projects over \$200,000 and less than \$500,000 (Replace Fuel Storage
2		Tank – Paradise River)
3		Hydro states on page D-40, lines 2-4, that "Hydro recommends replacing the existing tank with
4		two smaller 8,000 L tanks. Two tanks of this size provide approximately six weeks of bulk storage
5		for the diesel plant during peak demand periods, which Hydro has determined to be adequate
6		as fuel can be delivered to the Paradise River DGS by truck."
7		How did Hydro determine that six weeks of bulk storage was adequate? Please provide any
8		analyses conducted by Hydro that supports such an assertion.
9		
10		
11	А.	Newfoundland and Labrador Hydro's isolated systems fuel storage criteria are outlined in "Rural
12		Isolated Systems Generation Planning Criteria." <sup>1</sup> This document specifies the minimum amount
13		of fuel storage Hydro shall maintain on site in locations such as Paradise River where fuel is
14		supplied to the diesel plant as part of a vendor contract. Based on these criteria, the minimum
15		amount of fuel storage capacity required in Paradise River would allow for three weeks of
16		operation.
17		To achieve three weeks worth of fuel storage in Paradise River, 8,000 L of fuel storage is
18		required. As part of the estimation process, a determination was made that the total installed
19		cost of two 8,000 L fuel tanks would exceed the cost of two 4,000 L tanks by \$10,000. The
20		incremental cost was deemed to be justified on the basis it would eliminate the need for any

21 future requirement for temporary fuel storage in the event of tank maintenance.

<sup>&</sup>lt;sup>1</sup> Rural Planning Standard "Rural Isolated Systems Generation Planning Criteria Doc # RP-S-002," Newfoundland and Labrador Hydro, August 21, 2020, provided as Attachment 1 to CA-NLH-019 of this proceeding.