August 31, 2001

G. Cheryl Blundon Board Secretary Board of Commissioners of Public Utilities Suite E210, Prince Charles Building 120 Torbay Road P.O. Box 21040 St. John's, NF A1A 5B2

Dear Ms. Blundon:

Re: Newfoundland & Labrador Hydro's 2001 General Rate Application

Attached please find an original plus seventeen (17) copies of the following:

- a *revised* response to Request for Information (RFI) IC-18 (Rev). This revision 1) is in response to an application to the Board by Industrial Customers as a means of meeting the requirements of this request. It includes:
  - 1999 Actual (Rev) Generic Methodology (Attached) (a)
  - 2002 Test Year Generic Methodology (Attached) (b)
- 2) Hydro's Requests for Information NLH-90 and NLH-91.

Yours truly,

Newfoundland and Labrador Hydro

Maureen P. Greene, Q.C. Vice-President & General Counsel

MPG/jc

cc: Gillian Butler, Q.C. and Peter Alteen Counsel to Newfoundland Power Inc. 55 Kenmount Road P.O. Box 8910 St. John's, NF A1B 3P6

> Janet M. Henley Andrews and Stewart McKelvey Stirling Scales Cabot Place, 100 New Gower St. P.O. Box 5038 St. John's, NF A1C 5V3

Dennis Browne, Q.C.
Consumer Advocate
c/o Browne Fitzgerald Morgan & Avis
P.O. Box 23135
Terrace on the Square, Level II
St. John's, NF
A1B 4J9

Mr. Edward M. Hearn, Q.C. Miller & Hearn 450 Avalon Drive P.O. Box 129 Labrador City, NF A2V 2K3

Mr. Dennis Peck
Director of Economic Development
Town of Happy Valley-Goose Bay
P.O. Box 40, Station B
Happy Valley-Goose Bay
Labrador, NF
A0P 1E0

Joseph S. Hutchings Poole Althouse Thompson & Thomas P.O. Box 812, 49-51 Park Street Corner Brook, NF A2H 6H7

(Stephen Fitzgerald, Counsel for the Consumer Advocate) c/o Browne Fitzgerald Morgan & Avis P.O. Box 23135
Terrace on the Square, Level II St. John's, NF A1B 4J9

1 Q. Provide a Table which shows the following for each of the years 1994 - 2000 2 inclusive assuming the implementation of the Cost of Service Methodology 3 approved in the Public Utility Board 1993 Report (where the vertical axis 4 represents the years and the horizontal access the following data): 5 1. the demand rate which would have been charged the Industrial 6 Customers for firm power and for each class of non-firm service; 2. 7 the energy rate which would have been charged the Industrial 8 Customers for firm power and for each class of non-firm service and 9 for wheeling; 10 3. the Specifically Assigned Charges which would have been charged 11 Industrial Customers, and the total for all Industrial Customers; 12 4. the total number of kWh sold to the Industrial Customers for those 13 years for firm power and for each class of non-firm service and for 14 wheeling; 15 5. the total dollar amount which would have been billed to the Industrial 16 Customers in those years, exclusive of sales tax, for firm power and 17 for each class of non-firm service and for wheeling (indicate subtotals 18 for each class of service and overall total); the average cost per kilowatt hour which would have resulted; 19 6. 20 7. the total dollar amount which was billed to Industrial Customers: 21 8. the average cost per kilowatt hour which was billed to Industrial 22 Customers; 23 9. the difference between (5) and (7). 24 25 Α. In response to an Application to the Board by Industrial Customers, Hydro 26 will file the following Cost of Service Studies as a means of meeting the 27 requirements of this request:

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(a)	1999 Actual (Rev) - Generic Methodology (Attached)
(b)	2002 Test Year - Generic Methodology (Attached)
The f	ollowing will be filed as per the agreement reached with Industrial
Custo	omers as outlined at the August 29 <sup>th</sup> , 2001 meeting with the Public
Utilitie	es Board:
(c)	2000 Actual – Interim Methodology
(d)	2000 Actual – Generic Methodology
(e)	1997 Actual – Interim Methodology
(f)	1997 Actual – Generic Methodology
(g)	2001 Forecast – Interim Methodology
(h)	2001 Forecast – Generic Methodology
The t	erminology used by Hydro when referring to Cost of Service
meth	odologies is as follows:
Inte	rim Methodology – Methodology as approved in the PUB report
	dated April 13, 1992. Recommendation 11 of that report states that
	"Hydro's proposed cost of service methodology be used until it is
	examined more fully at another hearing".
Gen	eric Methodology - Methodology as approved in the PUB report
	dated February, 1993. Recommendation 26 of that report states
	"That the cost of service methodology recommended herein be
	adopted by Hydro for the purpose of its next rate referral".
Prop	oosed Methodology - Methodology as contained in the Cost of
	Service Study in the pre-filed evidence of Mr. John Brickhill, Exhibit
	JAB-1. The proposed methodology is based on the generic
	methodology adjusted as outlined in the written testimony of Mr.
	Brickhill.
	(b) The f Custo Utilitie (c) (d) (e) (f) (g) (h) The t meth Inter

# IN THE MATTER OF The Public Utilities Act, R.S.N., 1990, c. P-47 (the "Act")

AND IN THE MATTER OF an Application by Newfoundland and Labrador Hydro for approvals of (1) Under Section 70 of the Act, changes in the rates to be charged for the supply of power and energy to its Retail Customer, Newfoundland Power, its Rural Customers and its Industrial Customers; (2) Under Section 71 of the Act, its Rules and Regulations applicable to the supply of electricity to its Rural Customers; (3) Under Section 71 of the Act, the contracts setting out the terms and conditions applicable to the supply of electricity to its Industrial Customers; and (4) Under Section 41 of the Act, its 2002 Capital Budget

### **Requests for Information**

NLH-90 to NLH-91

(Filed pursuant to ss. 14 and 17 of the Board of Commissioners of Public Utilities Regulations, 1996)

Newfoundland & Labrador Hydro, Applicant

# Newfoundland & Labrador Hydro ("Hydro") 2001 General Rate Review

## Requests for Information from Hydro To <u>Labrador City</u>

#### Mark Drazen

NLH-90

Provide the date, company, and regulatory jurisdiction(s) in Canada in which Mr. Drazen presented testimony that the interest expense should be included in the lead/lag study, and the corresponding decisions on the issue.

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### Newfoundland & Labrador Hydro ("Hydro") 2001 General Rate Review

# Requests for Information from Hydro To Newfoundland Power

#### **Larry Brockman**

NLH-91

The Newfoundland Power Energy Supply Forecast (dated 2000 08 25) was used to derive forecast system sales and load as found in Schedule V of H.G. Budgell's prefiled testimony. Please provide this Energy Supply Forecast and all supporting documentation of the forecast of monthly 'Peak MW' as presented in the table labeled 'Purchase Forecast By Months'. Also, please provide a table detailing Newfoundland Power's peak demand at each of Newfoundland and Labrador Hydro's maximum monthly peaks for 1992-2000 as provided in NP-157. The table should include the corresponding demand purchases from Hydro as well as Newfoundland Power's own generation in megawatts.

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