

**IN THE MATTER OF** the *Public Utilities Act*  
R.S.N. 1990 Chapter 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.

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**Town of Labrador City Requests for Information**

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Edward M. Hearn, Q.C.  
Miller & Hearn

July 17, 2001

***Evidence of William E. Wells***

**Reference: Page 4, Line 24**

- a. Please provide a copy of the Board's 1993 Report on Costs of Service Methodology and the 1996 Report on Rural Electrical Service.

**Reference: Page 5, Line 29**

- a. Please provide copies of the Public Utilities Act, the Electrical Power Control Act (1994), and the Hydro Corporation Act (1996).

**Reference: Page 6, Line 20**

- a. Provide the basis for the statement that the "legislative amendments indicate that, as a matter of public policy, hydro is intended to operate . . . more similar to that of an investor-owned utility than had previously been the case".

**Reference: Page 6, Line 27**

- a. Provide a basis for the statement that the Government "has indicated that Hydro has a role to play in support of Government policy . . .".

**Reference: Page 8, Line 20**

- a. What is the anticipated date of the "next rate hearing" at which Hydro will provide a five-year rate plan?

**Reference: Page 12, Line 7**

- a. Please provide a copy of the 1993 Report on Hydro's Cost of Service Methodology.
- b. What, in the view of hydro, was the reason that the Board recommended a single cost of service study for the Labrador Interconnected System?

***Evidence of Derek Osmond***

**Reference: Page 12, Line 30**

- a. What was the basis for the Board's 1993 Report recommendation of a single cost of service study for the Labrador Interconnected System?
- b. Please provide a copy of the report and any material regarding Hydro's position regarding that recommendation.

**Reference: Page 13, Line 8**

- a. What was the basis for the original rates in the three separate areas (Happy Valley/Goose Bay, Wabush and Labrador City)?
- b. What was the cost of acquisition of the distribution assets for each of Wabush and Labrador City? Was this in excess of the book value at the time? If so, how was the difference treated?
- c. What additional investments and costs have been incurred since the time of acquisitions?
- d. Provide copies of all Board orders regarding these acquisitions and any policies related thereto.
- e. What commitments, if any, did Hydro make regarding rates to the customers in Wabush and Labrador City? Please provide relevant documents.

**Reference: Page 14, Line 16**

- a. How has revenue from CFB-Goose Bay been treated heretofore? What was the basis for that previous treatment?

**Reference: Page 16, Line 8**

- a. Please provide the calculations of the surplus “based on the costing methodology used in setting Wabush rates for 1989”.

***Evidence of John A. Brickhill***

**Reference: Page 12, Line 5**

- a. Please provide copies of the invoices from CF(L)Co for service to Labrador Interconnected System customers.

***Evidence of John C. Roberts***

**Reference: Schedule X**

- a. Do each of the long-term debt issues require semi-annual payments? On what dates? If not semi-annual, please provide a tabulation showing the payment schedule.
- b. Please provide a listing of the payment schedule of the Government of Canada loans.

***Evidence of Paul R. Hamilton***

**Reference: Page 4, Line 1**

- a. Please explain why the Labrador Interconnected System rates had not been adjusted to recover the allocated portion of the deficit.

***Evidence of H. G. Bludgell***

**Reference: Schedule II**

- a. Please explain why transmission losses for the Labrador Interconnected System have increased so much from 1991 (filed) to 1992 (actual) and from 1992 (actual) to 2000 (actual).

***Evidence of Kathleen McShane***

**Reference: Page 2, Line 26**

- a. Please provide a copy of the April, 1992, Reports of the Board.