

Requests for Information
Newfoundland & Labrador Hydro (“Hydro”) 2002 General Rate Review

- NP-304 Further to page 1 of Mr. Henderson supplementary evidence, provide details of the responses (including copies of actual responses) to the survey conducted on the use of hydrology data of other utilities. Include a listing of the questions and the responses for each utility, the name of each utility contacted, a name and telephone number for each utility representative contacted.
- NP-305 Explain why Hydro did not include 2000 production, which happens to be one of the highest hydraulic production years on record, in the data used in determining the forecast Hydraulic production for 2002 (filed with the Board in May 2001).
- NP-306 Mr. Henderson states at page 1 of his Supplemental Evidence that if Hydro used a 30 year average for test year hydraulic production, “we would not be planning operation of our system storage levels to ensure our firm loads could not be met with a repeat of a known historical occurrence.”
- (a) Does the witness believe it is necessary to link planning for the operation of the hydraulic system (the goal of which is ensuring adequate energy supply), with the forecast production of the hydraulic system in a test year (the goal of which is establishing reasonable electricity rates)?
 - (b) Does the availability of the RSP to deal with financial implications of a dry year provide increased flexibility in forecasting test year hydraulic production?
 - (c) Isn't it prudent to use a more conservative approach to planning (i.e., the use of a firm energy criteria) than the approach that would be employed to project hydraulic production for setting rates for a test year?
- NP-307
- (a) Mr. Henderson states at page 2 of his supplemental evidence, that utilities with significant hydraulic generation use the “full historic reliable data record” and the “length of the record depends on the particular facility with the length of records varying from 90 to 20 years”. Isn't this inconsistent with Hydro's approach in that the data used by Hydro does not depend on the generation facility but is the same for all facilities (i.e., Bay D'Espoir, Hinds Lake, Cat Arm)?
 - (b) If Hydro does not use the same hydrologic data record for all facilities, provide for each hydroelectric plant the number of years of hydrologic data used to determine normal.

- NP-308 At page 3 of his supplemental evidence, lines 7-8, Mr. Henderson states it is “prudent to use and reflect all reliable inflow records in determining average hydraulic generation”. Has Mr. Henderson conducted any studies to determine the accuracy of the inflows imputed for the 1950's?
- NP-309 Does Mr. Henderson believe that the climate today is the same as it was in the 1950s? Has Mr. Henderson discussed this issue with Environment Canada?
- NP-310 At page 3 of RJH supplemental evidence, Mr. Henderson states that use of a 30-year moving average would result in Hydro “Planning operation of the system ignoring the driest period of inflows, which would place energy supply at increasing risk”.
- (a) Please quantify the increased risk to the system of setting rates based on a 30-year average of inflows rather than a 51-year average.
 - (b) How will the setting of rates based on a 30-year average affect how Hydro plans the operation of the system?
- NP-311 Is Environment Canada the official source of the data used by Hydro in determining inflows? If not, please disclose the source of information for each plant.