

IN THE MATTER OF the *Public Utilities Act*,
R.S.N. 1990, c. P-47 (the “Act”)

AND IN THE MATTER OF a General Rate
Application (the “Application”) by Newfoundland
and Labrador NLH dated the 21st day of May,
2003, for approvals under Section 70 of the Act,
changes in the rates to be charged for the supply of
power and energy to Newfoundland Power, rural
customers, and industrial customers; and under
Section 71 of the Act, changes in the rules and
regulations applicable to the supply of electricity to
rural customers

CONSUMER ADVOCATE’S INFORMATION REQUESTS

TO: Board of Commissioners of Public Utilities
120 Torbay Road
P.O. Box 21040
St. John's, Newfoundland
A1A 5B2

CA-225 PUB On page 8, lines 20 to 25 of the Evidence of EES Consulting, it is stated that gas is currently available for generation within both the Island and Labrador Interconnected Systems. Please provide support for this statement.

CA-226 PUB On page 8, lines 2 to 3 of the Evidence of EES Consulting, it is stated that the load factor method is not the most common approach used today in ratemaking in North America. On line 9 of the same page, it is stated that the load factor method is simplistic as well as dated in its use. Please provide support for these statements, showing the jurisdictions that use either the load factor or peak credit methods, and indicating if the jurisdictions are primarily hydro-based systems such as Hydro. In addition, please show each jurisdiction that formerly used the load factor method and has since changed to another method.

CA-227 PUB On page 11, lines 39 to 40 of the Evidence of EES Consulting, it is stated that the minimum system method is the most widely accepted method across Canada. Please provide support for this statement, showing the jurisdictions that use this method. In

addition, please provide a comparison of the customer charges derived in the cost of service study with the actual customer charge being levied on consumers.

CA-228 PUB On page 19, lines 18 to 25 of the Evidence of EES Consulting, it is stated that Hydro has not provided a clear case for directly assigning transmission facilities in the GNP and Doyles-Port aux Basque areas. If the only reason for building the GNP transmission line was to bring lower-cost energy to Rural Customers, and the generation that originally resided on the peninsula were removed from service following completion of the transmission line, would it be clear that the transmission line facilities should be assigned directly to Rural?

CA-229 PUB On page 22, line 35 of the Evidence of EES Consulting, it is stated that EES understands that the Holyrood generating station is used as a peaking unit. Please provide support and justification for this understanding.

CA-230 PUB On page 24, lines 8 to 11 of the Evidence of EES Consulting, it is stated that energy charges in the NP rate should be based on time-of-use, but it is not viewed as having broad support at this time, nor is it operationally realistic to implement for the 2004 tariff. What is the basis for the statement that time-of-use does not have broad support. If it did have broad support, would EES recommend a time-of-use rate for immediate implementation, as soon as the “operational” issues were addressed? What are these “operational” issues that EES is referring to?

DATED AT St. John’s, Newfoundland and Labrador, this 11th day of September, 2003.

Stephen Fitzgerald
 Counsel for the Consumer Advocate
 Whose address for service is:
 Browne Fitzgerald Morgan & Avis
 Terrace on the Square, Level II, P.O. Box 23135
 St. John’s, NL A1B 4J9