

**IN THE MATTER OF** the *Public Utilities Act*, (R.S.N. 1990, Chapter P -47 (the "Act"), and

**IN THE MATTER OF** a General Rate Application (the "Application") by Newfoundland and Labrador Hydro for approvals of, 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.

**TO: The Board of Commissioners of Public Utilities (the "Board")**

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REQUEST FOR INFORMATION

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MILLER & HEARN  
P.O. Box 129  
450 Avalon Drive  
Labrador City, NL  
A2V 2K3

Per: Edward M. Hearn, Q.C.

## *Requests for information*

### ***Energy***

1. Please detail the annual energy (number of KWH) consumption for Labrador West for the past five years.
2. Please detail the annual energy consumption for Happy Valley – Goose Bay for the past five years.
3. What is the projected annual energy consumption for Labrador West for the next five years?
4. What is the projected annual energy consumption for Happy Valley – Goose Bay for each of the next five years?

### ***Revenue***

5. For the past five years what has been the total annual revenue collected from Newfoundland and Labrador Hydro selected by Newfoundland and Labrador Hydro from consumers in Labrador West? Please provide separate figures for each of the calendar years for Labrador City and Wabush customers.
6. For each of the past five years what has been the total annual revenue collected by Newfoundland and Labrador Hydro from consumers in Happy Valley – Goose Bay?

### ***Plant Investments***

7. What were Hydro's costs of acquisition for the distribution assets of each of Wabush and Labrador City?
8. What additional investments have been made by Hydro in Wabush and Labrador City since the acquisition of these systems?
9. What contributions have been received by Hydro from Wabush Mines and Iron Ore Company of Canada towards the upgrading of the systems since their acquisition by Hydro.
10. What is the total plant investment (before and after depreciation) for Hydro assets in the Happy Valley – Goose Bay area?
11. What was the capital cost for the transmission line from Churchill Falls to Happy Valley – Goose Bay?

***Maintenance Costs (please show all figures on an aggregate annual basis and on a per kilowatt hour basis)***

12. What have been the annual maintenance costs for the Labrador West System for each of the past five years?
13. What have been the annual maintenance costs for the Happy Valley – Goose Bay area distributional system for each of the past years?
14. What are the projected annual maintenance costs for the Labrador City / Wabush distributional system for each of the next five years?
15. Does IOCC or Wabush Mines contribute to present maintenance costs for the electrical distribution system for Labrador West. If so, how much?
16. What are the projected annual maintenance costs for the Happy Valley – Goose Bay distributional system for each of the next five years?
17. Detail the annual maintenance costs associated with the transmission line from Churchill Falls to Happy Valley – Goose Bay for the past five years.
18. What are the projected annual maintenance costs for the transmission line from Churchill Falls to Happy Valley – Goose Bay for each of the next five years?

***Staffing Levels***

19. Please outline in detail the staff employed in Labrador West by Hydro for each of the past five years.
20. What are the projected staff levels for Hydro for the Labrador West area for each of the next five years?
21. Outline in detail the staff employed by Hydro in the Happy Valley – Goose Bay area for each of the past five years.
22. Please outline in detail the projected staffing levels for the Happy Valley – Goose Bay area for the next five years.
23. What have been the annual payroll costs for the Labrador West area for the past five years?
24. What are the projected annual payroll costs for the Labrador West area for Hydro for each of the next five years?

25. What have been the annual payroll costs for Hydro in the Happy Valley – Goose Bay area for each of the past five years?
26. What are the projected annual payroll costs for Hydro for the Happy Valley – Goose Bay area for each of the next five years?

### ***Generation***

27. What are the present generation costs on a per kilowatt hour basis for energy consumed on the Labrador Interconnected System?
28. Are these generation costs projected to change in the next five years?

### ***Transmission***

29. Are there any transmission costs associated with the distribution of energy from Churchill Falls to Labrador West? If so please detail.
30. On a per kilowatt hour basis what are the current transmission costs for the delivery of energy from Churchill Falls to Happy Valley – Goose Bay?
31. Are these distribution transmission costs from Churchill Falls to Happy Valley – Goose Bay expected to change in the next five years? If so how?
32. Are there any transmission facilities that service both the Happy Valley – Goose Bay area and the Labrador West area? If so please explain.

### ***Overheads***

33. Please explain in detail and provide costs of overheads supplied to the Labrador Interconnected System. Such costs should be expressed on an aggregate annual basis and on a unit (per kilo watt hour basis)
34. Please outline projected annual overheads for the Labrador Interconnected System for each of the next five years.
35. What overheads are common to the Labrador West area and the Happy Valley – Goose Bay area?

### ***Rural Deficit***

36. What amount of the Rural Deficit is allocated to the Labrador Interconnected System? Please outline the methodology of the allocation of the Rural Deficit.
37. What are the projections for the Rural Deficit for each of the next five years?

38. Please show the allocation of the Rural Deficit to Labrador Interconnected System customers expressed on a per kilowatt hour basis.
39. Assuming the Rural Deficit were allocated as a tax applied on a per kilowatt hour basis to each unit of electrical energy produced in the Province whether exported or not, what level of taxation on a per kilowatt hour basis would be required to fund the rural deficit?

Dated at Labrador City, in the Province of Newfoundland and Labrador, this \_\_\_\_\_ day  
of July A.D. 2003.

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