

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")

REQUEST FOR ADDITIONAL INFORMATION

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

Per: Edward M. Hearn, Q.C.

Requests for information

Request No. 40

Please provide a bill analysis/proof of revenue for revenues from Labrador City and Wabush customers. If the total revenues differ from the number shown in LC-5, please provide reconciling information.

Request No. 41

What is the net accumulated depreciation as of December 31, 2002, for the distribution systems in Wabush and Labrador City? Please provide an update of the information in LC-8, along with accumulated depreciation, for the 2004 test year.

Request No. 42

Please provide a schedule similar to LC-10 as of December 31, 2004. For both 2002 and 2004, provide a breakdown of the plant investment, contributions and accumulated depreciation as between generation, transmission, distribution and general plant.

Request No. 43

Reference: Exhibit RDG-1, Pages 89 and 91

Please reconcile the gross and net plant investments shown in the cost of service study (Exhibit RDG-1) with the responses to LC-8 and LC-10 (as updated to the 2004 test year).

Reference: Exhibit RDG-1, Page 89, Line 4

Please explain why portions of transmission lines and Terminal Substations were functionalized to distribution. Please explain the facilities involved and the costs of each.

Request No. 44

Reference: Exhibit RDG-1, Page 89, Line 4

The corresponding page in the 1992 Forecast cost of service study, reviewed in the Cost of Service Methodology Hearing, showed \$26,123,736 of gas turbine investment. Please explain why the gross amount has decreased to \$22,489,284 in the 2004 cost of service.

Request No. 45

Reference: Exhibit RDG-1, Page 89, Line 5

Please identify the locations of the Terminal Stations, the dates when the Terminal Stations were installed and the gross and net cost of each.

Request No. 46

Reference: Exhibit RDG-1, Page 89

Response LC-11 states that the capital cost of the Churchill Falls to Happy Valley/Goose Bay was \$17,428,544. Please reconcile this with Exhibit RDG-1, Page 89.

Request No. 47

Reference: LC-12

Is the Wabush 46 kV bus functionalized as transmission or distribution? Please identify where on Exhibit RDG-1, Page 89, the costs are shown.

Request No. 48

Reference: LC-12, LC-13

Please explain why the annual maintenance costs decreased so much from 1999 through 2002. What amounts are included in the 2004 cost study?

Request No. 49

Reference: LC-12

Please explain and quantify the statement that “costs include Hydro’s proportion of annual costs for the Wabush Terminal Station”.

Request No. 50

Reference: LC-17

What amount of maintenance cost for the Churchill Falls to Happy Valley/Goose Bay transmission line is included in the 2004 cost of service study? How is this functionalized on Exhibit RDG-1, Page 92? What are the gross costs, contribution and accumulated depreciation for the 46 kV lines owned by Hydro in western Labrador? What are the associated maintenance costs?

Request No. 51

Reference: LC-32

Please explain how the 230 kV busses at Churchill Falls are connected to the 138 kV lines that run from Churchill Falls to Happy Valley/Goose Bay. Please provide a one-line diagram of the Churchill Falls facilities involved.

