

IN THE MATTER OF The Electrical Power
Control Act, 1994 and the Public Utilities Act

AND IN THE MATTER OF a hearing regarding
the Newfoundland and Labrador Hydro 2005
Capital Budget

REQUESTS FOR INFORMATION

The Industrial Customers require further particulars in respect of the Application filed as follows:

- | | | |
|-----------|---------|--|
| IC-50 NLH | p. B-5 | Provide copies of the October 1999 Agra report referred to at p. B-7 and of the Acres International Ltd. report expected in late August 2004 (if it has been delivered). |
| IC-51 NLH | p.B-11 | Provide number of maintenance occurrences per year for each valve replaced to date for a five year period prior to replacement and to date. |
| IC-52 NLH | p. B-13 | Explain how this penstock has been depreciated, including the service life, rate of depreciation, method of depreciation, any other charges or credits to the depreciation account, and further provide the same explanation for how the new penstock will be depreciated. |
| IC-53 NLH | p. B-13 | Provide copies of the Canbar Inc. reports referred to in Section G, Appendix 1 "Evaluation, Recommendation and Estimated Cost for Replacement" Report, at page 10 of that Report. |
| IC-54 NLH | p. B-13 | With reference to page 12, Section 6.3 of the foregoing Report, has the cost for the replacement penstock with fiberglass or high density plastic products, in 2006, been estimated? |

J:\clients\25754-28request-2

- IC-55 NLH p. B-13
- With reference to page 17, Section 8.0 of the foregoing Report, in respect of stated disadvantages of phased replacement, have the additional costs associated with the upgrade of the existing penstock in 2006 been included in the costing of phased replacement set out at page 15, Section 7.3 of the Report? If so, provide a breakout of these additional costs, and if not, what is the estimate of these additional costs?
- IC-56 NLH p. B-13
- With reference to page 17, Section 8.0 of the foregoing Report, in respect of stated disadvantages of phased replacement, what is the estimate of the annual operating maintenance costs associated with the existing penstock until replaced and the comparative estimate of those costs if entire replacement is completed in 2006?
- IC-57 NLH p. B-15
- What steps has Hydro taken and what steps are planned to reduce or eliminate the collection of brake dust and oil mist on the rotors and stators?
- IC-58 NLH p. B-16
- Provide a comparative cost benefit analysis between the Foxborough and Emerson proposals.
- IC-59 NLH p. B-19
- What are the estimated operation, maintenance and repair costs of the proposed anti-fouling systems over their expected service life?
- IC-60 NLH p. B-19
- What reduction in staff complement and retirement of equipment results from the implementation of this Project?

IC-61	NLH	p. B-20	Are SCADA, JDE, Lotus Notes, and telephone circuits to the Holyrood Generating Station, and teleprotection circuits for transmission lines TL242, TL218 and TL217, supported or supportable by existing or obtainable non-Hydro owned telecommunications facilities to the Holyrood Plant and Generating Station?
IC-62	NLH	p. B-21	What are the projected inspection and maintenance costs for a new steel liner for the first six years after its proposed replacement?
IC-63	NLH	p. B-25	Restate the Project Costs to break out the costs of construction of the new building proposed to house the diesel generator, and explain why the installation of the generator necessitates the construction of the building.
IC-64	NLH	p. B-28	Has Hydro considered the alternative of implementing a program of inspection for only those poles which are 20 years old and older?
IC-65	NLH	p. B-28	Has Hydro considered the alternative of contracting out, in whole or in part, the inspection and treatment program?
IC-66	NLH	p. B-28	Break out portion of this Project being specifically assigned to Hydro Rural or another customer group and the portion assigned to common in the Cost of Service Study.
IC-67	NLH	p. B-30	What is the projected outage frequency rate for the line after completion of this Project?

IC-68 NLH	p. B-32	Provide better particulars of the increase in the number of defective COB insulators on this transmission line, and of how the number of defective insulators and the rate of increase in that number compares with Hydro's experience with insulators (COB and non-COB) on its other transmission lines.
IC-69 NLH	p. B-32	Provide better particulars to explain why replacement of only defective insulators or a phased replacement program, for this transmission line, would be less cost effective than the proposed full replacement at this time.
IC-70 NLH	p. B-32	Has there been any failure of this transmission line attributable to failure of a COB insulator?
IC-71 NLH	p. B-42	What is the average cost of one of the replacement instrument transformers referred to in this Explanation?
IC-72 NLH	p. B-44	What is the average cost of one of the replacement surge arrestors referred to in this Explanation?
IC-73 NLH	p. B-46	To what extent, if at all, is the life of the Terminal Station, the Powerhouse or any other asset extended, or the asset base enhanced, by this Project?
IC-74 NLH	p. B-77	Provide particulars of the equipment to be installed under this Project and the range of costs of single installations.
IC-75 NLH	p. B-103	Identify the reduction of staff levels and any other savings associated with the operational re-alignment in 2003 referred to in this Explanation.
IC-76 NLH	p. B-110	Provide a Cost Benefit Analysis for the work to be completed by acquisition of this equipment, including internal labour costs for its use, as opposed to contracting out the service.

IC-77 NLH	p. B-112	To what extent has Hydro explored contracting out the work to be done with these test sets, and what supports the conclusion to do the work in-house?
IC-78 NLH	p. B-120	How many staff positions have become redundant or are forecast to become redundant as a result of the elimination of redundant processes and redundancy of manual effort referred to in this Explanation as it relates to Intranet?
IC-79 NLH	p. B-120	What hardware and software is intended to be used for Hydro's KPI Application, and what alternatives have been considered?
IC-80 NLH	p. B-124	Identify by name and version each software program to be modified or tested with this Project, describe the functionality of each program and the use to which Hydro puts it, including the number of licensed users and the number of regular users (those who use on a weekly basis or more frequently) and identify any enhancements to the functionality of the programs to be achieved by this Project.
IC-81 NLH	Production Evidence	In relation to line 23 at p. 3, identify the Capital Budget items in the present Application which reduce cost or improve efficiency, and quantify the reduced cost arising from each such Project.
IC-82 NLH	Production Evidence	In relation to the evidence at line 7 of p. 8, identify the routine annual projects referred to in this evidence.
IC-83 NLH	TRO Evidence	In relation to line 1 at p. 2 of this evidence, identify the specific projects which are forecast to improve the SAIDI/SAIFI statistics and quantify the anticipated improvement.
IC-84 NLH	TRO Evidence	Does Hydro perform any analysis to determine the relationship between revenue generated by increased capacity and the cost of that increased capacity?

IC-85 NLH	TRO Evidence	What is the current revenue to cost ratio on the L'Anse au Loup system and what would the load need to be to achieve a one to one revenue to cost ratio?
IC-86 NLH	Finance Evidence	Provide Hydro's policies defining which expenditures are regarded as Capital and which are regarded as Operating, together with any comments from Hydro's auditors or any external consultant who has reviewed such policy or policies.

DATED at Corner Brook, Newfoundland and Labrador, this 20th day of September, 2004.

STEWART McKELVEY STIRLING SCALES

Paul L. Coxworthy

POOLE ALTHOUSE

Joseph S. Hutchings, Q.C.

TO:

The Board of Commissioners
of Public Utilities
Prince Charles Building
P.O. Box 9188
St. John's, NL
A1A 2X9

AND TO:

Newfoundland and Labrador Hydro
Columbus Drive
P.O. Box 9100
St. John's, NL
A1A 2X8

Attn: Maureen Greene, Q.C.

AND TO:

Newfoundland Power Inc.
55 Kenmount Road
P.O. Box 8910
St. John's, NL A1B 3P6

Attn: Gerard Hayes and Peter Alteen