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 approval 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.

Requests for Information of the Island Industrial Customers

- IC-156 NLH Please provide a schedule that breaks down the components of the \$2.7 million overhaul at Holyrood Unit No. 3 planned for 2007.
- IC-157 NLH Please confirm that all of the \$2.7 million overhaul expense for Holyrood Unit No. 3 in 2007 is included in System Equipment Maintenance expense in the test year. If this cannot be confirmed please identify the portion that is not included at SEM expense and explain where it is included in the test year revenue requirement.
- IC-158 NLH Please expand the schedule provided in IC 12 NLH to include the same information for the 2004 test year and the 2007 test year. Please also confirm if the 2004 and 2007 figures in the table are the ones Hydro refers to when it states that approximately 20% of the capital program is capitalized salaries (as at page 23 of the Finance and Accounting Evidence).
- IC-159 NLH Please explain the distinction between "capitalized overheads" and "capitalized salaries" in the response to IC 12 NLH.
- IC-160 NLH Please provide detailed calculations, by month if necessary, showing how the No. 6 fuel expense of \$142.488 million is derived from the Production, Conversion Factor and Average Fuel Price figures in Haynes Schedule VI.
- IC-161 NLH Re: NERA July 2006 Report, Table 7: Please provide all assumptions, billing determinants and calculations in support of Table 7, including the determination of the 4500 MWh per customer (and how this relates to the 50,000 MWh per month total class block size).

- IC-162 NLH Re: Exhibit RDG-2: Please re-run Exhibit 6 showing the "base case" as well as 4 cases as follows: a) where the energy required on the system varies (i.e., is reduced from the base case) by 100 GW.h/year for each year throughout the forecast, but peak loads and system generation is not adjusted; b) the same as (a) but with energy reduced by 250 GW.h per year; c) the same as (a) but with energy increased by 100 GW.h per year; and, (d) the same as (a) but with energy increased by 250 GW.h per year. Please show all calculations of scenario cost by year and "components of change from base" (as shown in RDG Table 5), as well as the calculation of CPW (including all assumed discount rates) and calculation of end effects.
- IC-163 NLH Re: IC-60: Please re-run RDG-2 Exhibit 6 using the 2006 PLF. Please show all calculations of scenario cost by year and "components of change from base" (as shown in RDG Table 5), as well as the calculation of CPW (including all assumed discount rates) and calculation of end effects.
- IC-164 NLH Re: NP-26: Please expand the table to show 2004 Final Approved Test Year, and 2004 actuals. With respect to depreciation expense, please separately identify the component of depreciation for each year shown in NP-26 and for 2004 Test Year and 2004 actuals by description (as this term is used in Table 1 at page 7 of Exhibit MGB-3) and indicate the source of all changes (by description category) from 2004 to 2007, including addition of assets and change to depreciation rates (both due to sinking fund methodologies as well as any other depreciation rate changes implemented by Hydro).
- IC-165 NLH Please provide Bradbury Schedule IV forecast for the years 2008 to 2011.
- IC-166 NLH IC-238 from the 2003 GRA indicates Government of Canada debt to be due March 31, 2014. Bradbury Schedule IV does not show this instrument. Please indicate what happened to the Government of Canada debt. If repaid, what triggered the repayment? If excluded from the 2006 GRA, please provide a description why this note is excluded and what rationale led to a change from the 2004 Test Year approach.
- IC-167 NLH Re: IC-59: Please provide the assumed barrels, the net efficiency and the forecast fuel prices used to calculate the table on Page 8 of 10.
- IC-168 NLH Re: IC-124: Given that Hydro's base case planning scenario as shown in IC-53 indicates new hydro resources of Island Pond at 2014 and Round Pond at 2017 and Portland Creek at 2018, please provide Hydro's planning schedules for these projects, including planning activities and all related spending forecasts for 2007 through 2011.
- IC-169 NLH Re: IC-53: Hydro now indicates that newest new hydro is planned to be in-service for 2014 (Island Pond) compared to 2011 under the "base case" planning sequence in Exhibit RDG-2. Please provide the rationale for delay is bringing new hydro generation into service, particularly given the current oil price forecast and forecast generation at Holyrood (over 1500 GW.h for each year of the 20 year forecast provided).

IC-170 NLH Please confirm that the data provided in IC-59 is based on a development sequence reflecting the 2006 Provincial Load Forecast. Please confirm that the development sequence provided in IC-53 is not consistent with IC-59 and provide the explanation for the difference. Please confirm that the results in IC-53 and IC-59 are not materially different with the exception of in some cases a revised in service date of one-year.

<u>DATED</u> at St. John's, Newfoundland and Labrador this 10th day of October, 2006.

	POOLE ALTHOUSE
	Per: My Country Joseph S. Hutchings, Q.C.
	STEWART MCKELVEY
	Per: Paul L. Coxworthy
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Attention:	Ian Kelly, Q.C. and Peter Alteen, Legal Counsel

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