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December 11, 2017

Via Email & Courier

Board of Commissioners of Public Utilities Prince Charles Building 120 Torbay Road, P.O. Box 21040 St. John's, NL A1A 5B2

Attention:

Ms. Cheryl Blundon

Director of Corporate Services & Board Secretary

Dear Ms. Blundon:

Re:

2017 General Rate Application - Requests for Information on Expert Reports

NLH-IOC-001 - NLH-IOC-009

Please find enclosed the original and thirteen (13) copies of Hydro's Requests for Information NLH-IOC-001 to NLH-IOC-009 in relation to the above noted Application.

If you have any questions, please contact the undersigned.

Yours truly,

NEWFOUNDLAND AND LABRADOR HYDRO

Tracey L. Pennell

Senior Counsel, Regulatory

TLP/skc

Encl.

cc: Gerard Hayes - Newfoundland Power

Paul Coxworthy - Stewart McKelvey Stirling Scales

Denis J. Fleming - Cox & Palmer

ecc: Van Alexopoulos - Iron Ore Company

Senwung Luk - Labrador Interconnected Group

Dennis Browne, Q.C. - Consumer Advocate

Dean Porter - Poole Althouse

Benoît Pepin - Rio Tinto

IN THE MATTER OF the Electrical Power Control Act, 1994, SNL 1994, Chapter E-5.1 and the Public Utilities Act, RSN 1990, Chapter P-47 (the Act);

AND IN THE MATTER OF a General Rate Application (the Application) by Newfoundland and Labrador Hydro to establish customer electricity rates for 2018 and 2019.

NEWFOUNDLAND AND LABRADOR HYDRO

Requests for Information
NLH-IOC-001 to NLH-IOC-009

NLH-IOC-001

RE: Evidence of the Iron Ore Company of Canada, paragraph 25.

Please provide a copy of the engineering study completed by BBA in relation to the use of the IOC static compensator.

NLH-IOC-002

RE: Evidence of the Iron Ore Company of Canada, paragraph 27.

As noted in Hydro's response to IOC-NLH-021, "In 2010, Hydro fully funded a facility-wide energy audit of IOC; the audit identified nine energy efficiency opportunities at the site." Of the nine projects that were identified, please indicate which projects were undertaken and the estimated demand and energy savings that resulted from each.

NLH-IOC-003

Further to NLH-IOC-002, if any of the projects identified in the 2010 energy efficiency audit were not undertaken, please provide an explanation as to why such projects were not undertaken by IOC.

NLH-IOC-004

In the past five years, has IOC implemented any energy efficiency initiatives, other than those identified in the 2010 energy efficiency audit conducted by Hydro? If so, please describe each initiative and provide the estimated peak demand and annual energy savings achieved.

NLH-IOC-005

Further to NLH-IOC-004, if no energy efficiency initiatives have been undertaken in the past five years, please provide an explanation as to why no such projects were undertaken by IOC.

NLH-IOC-006

Does IOC intend on undertaking any energy efficiency initiatives in the next 5 years? If so, please provide a description and timeline for the implementation of such projects. If not, please provide an explanation as to why no such projects are planned in the next five years.

NLH-IOC-007

RE: Evidence of the Iron Ore Company of Canada, paragraphs 17 and 26.

It is stated IOC's Power on Demand for 2018 is 250 MW and "IOC can only substitute clean hydroelectricity with more expensive GHG emitting heavy oil generators." Please indicate the capacity that could be displaced by the use of IOC's heavy oil generators.

NLH-IOC-008

RE: Evidence of the Iron Ore Company of Canada, paragraph 28.

It is stated "IOC cannot substitute its electricity supply with a prolonged use of its heavy oil generators, since they require regular maintenance." Please provide a detailed description of the status of IOC's heavy oil generation assets, including details of their ages and maintenance schedules.

NLH-IOC-009

RE: Evidence of the Iron Ore Company of Canada, paragraph 31.

It is stated "running [IOC's] heavy oil generators will impose costs on the range of 40,000\$ per day on its Labrador operations." Please provide a breakdown of the underlying component costs comprising the estimated \$40,000 per day cost of IOC running its heavy oil generators.

DATED at St. John's, in the Province of Newfoundland and Labrador this It day of December, 2017.

Tracey L. Pennell

Counsel for the Applicant

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TO:

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Attention: Board Secretary

TO:

Newfoundland Power Inc.

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

Attention: Gerard Hayes, Senior Legal Counsel

TO:

Dennis Browne, Q.C., Consumer Advocate

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TO: Benoît Pepin, Iron Ore Company of Canada

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