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LAWYERS

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January 19, 2016

The 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: In the Matter of an Application by Newfoundland and Labrador Hydro
pursuant to Sections 70 and 71 of the Act for the approval of a
Net Metering Program**

Further to the above-captioned, enclosed please find the original and twelve (12) copies of the Consumer Advocate's Requests for Information numbered CA-NLH-001 to CA-NLH-009.

A copy of this letter, together with enclosures, has been forwarded directly to the parties listed below.

If you have any questions regarding the enclosed, please contact the undersigned at your convenience.

Yours truly,



Dennis Browne, Q.C.
Consumer Advocate

/bb

CC **Newfoundland and Labrador Hydro**
Geoff Young (gyoung@nlh.nl.ca)
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NLH Regulatory (NLHRegulatory@nlh.nl.ca)

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1 **IN THE MATTER OF** the *Electrical Power*
2 *Control Act*, 1994, SNL 1994, Chapter E-5.1 (the
3 *EPCA*) and the *Public Utilities Act*, RSNL 1990
4 Chapter P-47 (the “*Act*”) and regulations thereunder;
5
6 **IN THE MATTER OF** an Application
7 by Newfoundland and Labrador Hydro
8 pursuant to Sections 70 and 71 of the Act, for
9 the approval of a Net Metering Program

**CONSUMER ADVOCATE
REQUESTS FOR INFORMATION**

CA-NLH-001 to CA-NLH-009

Issued: January 19, 2017

1 CA-NLH-001

In the Executive Summary to the Proposed Net Metering Program, at page (ii) Hydro states that after the Muskrat Falls Project, costs are reflected on customer rates.

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- (a) What year does Hydro maintain will be “after” Muskrat Falls?
- (b) What costs does Hydro propose for customer rates “after” Muskrat Falls?
- (c) Has the Public Utilities Board approved the closure of Holyrood “after” Muskrat Falls?
- (d) Please advise if the Net Metering Program, as proposed (without any regard to Muskrat Falls), is in fact a cross-subsidization by non-participants, and estimate the cost of the cross-subsidization.

1 CA-NLH-002

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In reference to Hydro's proposed Net Metering Program, what general service customers does Hydro figure would participate in this program? Provide, generally, some likely candidates who would be interested in Net Metering.

1 CA-NLH-003

2 Hydro has stated on page 6, line 19, that only generation facilities
3 owned by the customer with a total capacity of no more than 100kW
4 and located on the customer's own property are eligible for the Net
5 Metering Program.

6 (a) Please calculate for such a hypothetical customer with a total
7 generation capacity of 100 kW, currently consuming 2000
8 kWh per month, at an energy rate of \$0.10 per kWh. What will
9 be credited per month (savings/input) in the Net Metering
10 Program as proposed for such a customer.

11 (b) Please provide the basis for the calculation.

12 (c) Please do a similar calculation for a hypothetical customer
13 using 3000 kWh per month at an energy rate of \$0.10 per kWh.

14 (d) Please do a similar calculation for a hypothetical customer
15 using 4000 kWh per month at an energy rate of \$0.10 per kWh.
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1 CA-NLH-004

The Application states on page 7, line 17, that Hydro requires payment to perform any upgrading to distribution systems or installing metering equipment.

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- (a) What, on average, does Hydro anticipate would be the cost for such a customer for such upgrading and installations?
- (b) How much work would be involved by Hydro? Please elaborate.

- 1 CA-NLH-005 (a) What are Hydro's expectations as to how many customers will
2 avail of the Net Metering Program?
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4 (b) What is the maximum number of Hydro's customers who
5 could participate in the program, bearing in mind the 5 MW
6 cap?
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8 (c) Hypothetically, if all of Hydro's customers decided to avail of
9 the program, to a maximum of 100 kW, would that be feasible
10 with a 5 MW cap? For how many customers would it be
11 feasible in that circumstance?

1 CA-NLH-006

In Appendix "E" to the Application – the Net Metering Interconnection Agreement, page 5 of 7 at 6.5 Hydro is requesting the right to enter customer's premises at all reasonable hours without notice to customers to inspect customers' protective devices and so on.

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(a) Does "premises" include a customer's home and is Hydro suggesting that a person's home could be entered without notice?

(b) Is Hydro asking the Public Utilities Board to approve an Interconnection Agreement which would allow Hydro to enter a person's premises without notice? Please elaborate as to how this would work.

1 CA-NLH-007

2 In Appendix "E", page 5 of 7 – the Net Metering Interconnection
3 Agreement, Hydro has proposed a Dispute Resolution. Hydro's
4 proposal involves discussion between parties regarding the dispute
5 but provides no dispute resolution mechanism.

6 (a) Provide particulars as to what dispute resolution Hydro proposes
7 to resolve a dispute?

8
9 (b) Is Hydro proposing third party arbitration or mediation?

1 CA-NLH-008

2 In the Executive Summary, page ii, commencing at line 18, Hydro
3 proposes that its use of a payout rate reflective of system marginal
4 generation costs to apply to net excess generation instead of the use
5 of the retail rate.

6 (a) Please provide, in practical terms, what this will mean for Hydro's
7 customers.

8
9 (b) How will the system marginal generation costs to apply be
10 calculated?

11
12 (c) What will that rate be?

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14 (d) How will that calculation compare to the use of the retail rate?
15 Please elaborate.

1 CA-NLH-009

2 Is Hydro prepared to work with Newfoundland Power to place a
3 consumer friendly insert in customers' bills or online, as the case may
4 be, to describe fully and completely the Net Metering Program,
5 including the cost of the program, together with practical examples so
6 that ratepayers can be completely informed as to possible savings
7 under the Net Metering Program.

8 What agreement is in place with Newfoundland Power and
9 Newfoundland and Labrador Hydro re sharing the maximum 5 MW
10 available under this program? Please elaborate as to how this will
11 work.

DATED at St. John's, Newfoundland and Labrador, this 19th day of January, 2017.

Per:



A handwritten signature in black ink, appearing to read 'Dennis Browne', is written over a horizontal line. The signature is fluid and cursive.

Dennis Browne, Q.C.

Consumer Advocate

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Dear Ms. Blundon:

Re: In the Matter of an Application by Newfoundland Power Inc.
to approve of a Net Metering Program

Further to the above-captioned, enclosed please find the original and twelve (12) copies of the Consumer Advocate's Requests for Information numbered **CA-NP-001 to CA-NP-013.**

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If you have any questions regarding the enclosed, please contact the undersigned at your convenience.

Yours truly,

Dennis Browne, Q.C.
Consumer Advocate

Encl.

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Newfoundland and Labrador Hydro
Geoff Young (gyoung@nlh.nl.ca)
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