

Office of the Consumer Advocate

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September 7, 2017

Board of Commissions of Public Utilities
120 Torbay Road, P.O. Box 2140
St. John's, NL A1A 5B2

**Attention: G. Cheryl Blundon, Director of
Corporate Services / Board Secretary**

Dear Ms. Blundon:

RE: Newfoundland and Labrador Hydro - 2018 Capital Budget Application

Further to the above-captioned, enclosed please find enclosed the original and twelve (12) copies of the Consumer Advocate's further Requests for Information (CA-NLH-005 to CA-NLH-006) to those filed yesterday.

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

Thank you for your indulgence with respect to the further filing in reference to this matter.

Yours truly,



Dennis Browne, Q.C.

Encl.
/bb

cc **Newfoundland & Labrador Hydro**
Tracey Pennell (traceypennell@nlh.nl.ca)
Geoff Young (gyoung@nlh.nl.ca)
NLH Regulatory (NLHRegulatory@nlh.nl.ca)

Board of Commissioners of Public Utilities
Cheryl Blundon (cblundon@pub.nl.ca)
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Newfoundland Power Inc.
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Paul Coxworthy (pcoxworthy@stewartmckelvey.com)
Dean Porter (dporter@poolealthouse.ca)

Praxair Canada Inc.
Sheryl Nisenbaum (sheryl_nisenbaum@praxair.com)

IN THE MATTER OF

the *Electrical Power Control Act, 1994*,
SNL 1994, Chapter E-5.1 (the “EPCA”)
and the *Public Utilities Act*, RSNL 1990,
Chapter P-47 (the “Act”), as amended, and
regulations thereunder; and

IN THE MATTER OF

an Application by Newfoundland and Labrador Hydro
for an Order approving:

- 1) its 2018 capital budget pursuant to s. 41(1) of the *Act*;
- 2) its 2018 capital purchases and construction projects in excess of \$50,000 pursuant to s. 41(3)(a) of the *Act*;
- 3) its leases in excess of \$5,000 pursuant to s. 41(3)(b) of the *Act*;
- 4) its estimated contributions in aid of construction for 2018 pursuant to s. 41(5) of the *Act*.

**CONSUMER ADVOCATE
REQUESTS FOR INFORMATION**

CA-NLH-005 to CA-NLH-006

Issued: September 7, 2017

- 1 CA-NLH-005 In reference to the 214 MW hydro peaking unit capacity, being Bay
2 d'Espoir at 150 MW and Cat Arm at 64 MW:
3
- 4 (a) What would be the impact of this 214 MW hydro peaking unit
5 capacity, if installed, of reducing Holyrood fuel for the Avalon
6 winter peak?
7
- 8 (b) What is the cost of the 214 MW peaking units?
9
- 10 (c) Would the installation of the 214 MW of peaking capacity reduce
11 summer water spills?
12
- 13 (d) Why did Hydro wait until 2017 to inform ratepayers that there was
14 214 MW of available peaking capacity on the island?
15
- 16 CA-NLH-006 In reference to the Happy Valley Interconnection and the cost thereof:
17
- 18 (a) Should this \$19,978,500 cost be a part of the Muskrat Falls project?
19
- 20 (b) As to the labour component of \$2,694,000, please provide details in
21 reference to this component? Why is the component not a part of
22 the \$11,632,600 contract work?
23
- 24 (c) Why is the contingency \$3,215,600 so high? This is approximately
25 16% of the total project cost of \$19,978,500.

DATED at St. John's, Newfoundland and Labrador, this 7th day of September, 2017.

Per:



Dennis Browne, Q.C.
Consumer Advocate

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