

The Consumer Advocate

PO Box 23135
Terrace on the Square
St. John's, NL Canada
A1B 4J9

Tel: 709-724-3800
Fax: 709-754-3800

August 14, 2019

Hand Delivered

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

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

Dear Ms. Blundon:

**Re: Newfoundland and Labrador Hydro – Application for
Revisions to Cost of Service Methodology
- Requests for Information**

Further to the above-captioned, enclosed please find enclosed the original and eight (8) copies of the Consumer Advocate's further Requests for Information numbered CA-NP-001 to CA-NP-005 and CA-IC-001.

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

Yours truly,


Stephen Fitzgerald
Counsel for the Consumer Advocate

Encl.
/bb

cc **Newfoundland and Labrador Hydro:**
Geoff Young, Q.C. (gyoung@nlh.nl.ca)
Shirley Walsh (shirleywalsh@nlh.nl.ca)
NLH Regulatory (Regulatory@nlh.nl.ca)
Newfoundland Power Inc.:
Gerard Hayes (ghaves@newfoundlandpower.com)
Kelly Hopkins (khopkins@newfoundlandpower.com)
Liam O'Brien (lobrien@curtisdawe.com)
NP Regulatory (regulatory@newfoundlandpower.com)
Public Utilities Board
Jacqui Glynn (jglynn@pub.nl.ca)
Maureen Greene (mgreene@pub.nl.ca)
Sara Kean (skean@pub.nl.ca)
NL Public Utilities Board (ito@pub.nl.ca)

Island Industrial Customer Group:
Paul Coxworthy (pcoxworthy@stewartmckelvey.com)
Dean Porter (dporter@poolealthouse.ca)
Denis Fleming (dfleming@coxandpalmer.com)
Iron Ore Company of Canada
Gregory Moores (gmoores@stewartmckelvey.com)
Labrador Interconnected Customer Group:
Senwung Luk (sluk@oktlaw.com)

IN THE MATTER OF

the Electric Power Control Act, 1994,
SNL 1994, Chapter E-5.1 (the "EPCA")
and the Public Utilities Act, RSNL 1990,
Chapter P-47 (the "Act"); and

IN THE MATTER OF

an Application by Newfoundland and Labrador
Hydro ("*Hydro*") for approval of revisions to its
Cost of Service Methodology pursuant to Section 3
of the EPCA (the "*Cost of Service Methodology
Application*") for use in the determination of test year
class revenue requirements reflecting the inclusion of
the Muskrat Falls Project costs upon full commissioning.

**CONSUMER ADVOCATE
REQUESTS FOR INFORMATION**

CA-IC-001

Issued: August 14, 2019

1 CA-IC-001 (Reference Pre-filed Testimony of Andrew McLaren) It is stated (page 21,
2 lines 29 to 30) “*The CBPP pilot agreement should be continued until a*
3 *replacement agreement is available.*” Hydro states (page 18, lines 4 to 7
4 of Hydro’s report included with the Cost of Service Application) “*The*
5 *benefits to all customers arising from the fuel cost savings that supported*
6 *the pilot project implementation are not expected to continue upon*
7 *commissioning of the Muskrat Falls Project. Therefore, Hydro proposes*
8 *to discontinue the generation credit agreement between Hydro and CBPP*
9 *upon full commissioning of the Muskrat Falls Project.*” What incentive
10 does CBPP have to negotiate a replacement agreement when it knows the
11 value of its generation will decrease post Muskrat Falls commissioning?
12 For how long should other customers on the system, including other
13 Industrial Customers, subsidize CBPP while waiting for the conclusion of
14 negotiations on a replacement agreement?

DATED at St. John’s, Newfoundland and Labrador, this 14th day of August, 2019.

Per: 

Stephen Fitzgerald

Counsel for the Consumer Advocate

Terrace on the Square, Level 2, P.O. Box 23135

St. John’s, Newfoundland & Labrador A1B 4J9

Telephone: (709) 724-3800

Telecopier: (709) 754-3800