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August 14, 2019

***Via Electronic Mail & Courier***

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

**Attention: Ms. G. Cheryl Blundon**  
**Director of Corporate Services and Board Secretary**

Dear Ms. Blundon:

**Re: 2018 Hydro Cost of Service and Rate Design Review Application (the "Application")**  
**Requests for Information - IC-CA-001 to IC-CA-005 & IC-NP-001 to IC-NP-005**

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Please find enclosed one original and thirteen (13) copies of the Requests for Information of the Island Industrial Customers Group in relation to the above noted Application.

We trust you find the foregoing satisfactory.

Yours very truly,

**POOLE ALTHOUSE**

Dean A. Porter

DAP/ag  
Enclosures  
J:\Clients\4648-21\NLBCPU, ltr 1.doc

cc: Shirley Walsh - Newfoundland and Labrador Hydro  
Gerard Hayes - Newfoundland Power  
Dennis M. Browne Q.C. - Consumer Advocate  
Denis J. Fleming - Cox & Palmer  
Senwung Luk – Olthuis Kleer Townshend LLP  
Paul Coxworthy - Stewart McKelvey  
Greg Moores – Stewart McKelvey

**IN THE MATTER OF** the *Electrical Power Control Act, 1994*, SNL 1994, Chapter E-5.1 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 *Electrical Power Control Act, 1994*, SNL 1994, Chapter E-5.1 (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.

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**ISLAND INDUSTRIAL CUSTOMERS GROUP  
REQUESTS FOR INFORMATION  
IC-CA-001 to IC-CA-005**

**Issued: August 14, 2019**

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**IN THE MATTER OF** the *Electrical Power Control Act, 1994*, SNL 1994, Chapter E-5.1 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 *Electrical Power Control Act, 1994*, SNL 1994, Chapter E-5.1 (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.

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**REQUESTS FOR INFORMATION OF  
THE ISLAND INDUSTRIAL CUSTOMERS GROUP  
IC-CA-001 to IC-CA-005**

**Hydro’s COS Methodology Review Application**

**Pre-filed Testimony filed by Doug Bowman (Consumer Advocate)**

- IC-CA-001**                     In Mr. Bowman’s view, should COS methods consider how the utility’s system is operated, in addition to how the system is planned?
  
- IC-CA-002**                     With reference to page 15 lines 21 through page 16 line 5 of the Pre-Filed Evidence of C. Douglas Bowman (August 5, 2019), in Mr. Bowman’s view would it be reasonable to consider functionalizing the LTA to transmission if it is transferring power in both directions?
  
- IC-CA-003**                     Please discuss, in Mr. Bowman’s view, whether functionalizing generation leads to transmission and then classifying them using the same ratios as the associated generation would be expected to yield similar COS results as functionalizing them as generation. Why or why not?
  
- IC-CA-004**                     With reference to lines 7 through 17 on page 22 of the Pre-Filed Evidence of C. Douglas Bowman (August 5, 2019), can Mr. Bowman provide references to other utilities who use similar indexing approaches in calculations for the equivalent peaker method?

1 **IC-CA-005**

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With reference to lines 14 through 20 of page 19 of the Pre-Filed Evidence of C. Douglas Bowman (August 5, 2019) what approach, if any, does Mr. Bowman suggest for addressing the issues related to cost uncertainty for the costing of peaker units as discussed at lines 16 on page 34 through line 2 on page 35 of the Brattle Group report?

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


**POOLE ALTHOUSE**

Per:   
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Dean A. Porter

**STEWART MCKELVEY**

Per:   
\_\_\_\_\_  
Paul L. Coxworthy

**COX & PALMER**

Per:   
\_\_\_\_\_  
Denis J. Fleming

TO: The Board of Commissioners of Public Utilities  
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P.O. Box 21040  
St. John's, NL A1A 5B2  
Attention: Board Secretary

TO: Newfoundland & Labrador Hydro  
P.O. Box 12400  
500 Columbus Drive  
St. John's, NL A1B 4K7  
Attention: Shirley Walsh

TO: Newfoundland Power  
P.O. Box 8910  
55 Kenmount Road  
St. John's, NL A1B 3P6  
Attention: Gerard Hayes, Legal Counsel

TO: Browne Fitzgerald Morgan & Avis  
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Attention: Senwung Luk

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Attention: Paul Coxworthy

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Attention: Greg Moores