



NEWFOUNDLAND AND LABRADOR
BOARD OF COMMISSIONERS OF PUBLIC UTILITIES
120 Torbay Road, P.O. Box 21040, St. John's, Newfoundland and Labrador, Canada, A1A 5B2

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2019-08-14

Mr. Dennis Browne, Q.C.
Consumer Advocate
P.O. Box 23135
Terrace on the Square
St. John's, NL A1B 4J9

Dear Mr. Browne:

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

Enclosed are Requests for Information PUB-CA-001 to PUB-CA-006 regarding the above-noted application.

If you have any questions, please do not hesitate to contact the Board's Legal Counsel, Ms. Jacqui Glynn, by email, jglynn@pub.nl.ca or telephone (709) 726-6781.

Sincerely,

Cheryl Blundon
Board Secretary

CB/cs

Enclosure

cc **Newfoundland & Labrador Hydro**
Shirley Walsh, E-mail: shirleywalsh@nlh.nl.a
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Labrador Interconnected Group
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1 **IN THE MATTER OF**
2 the *Electrical Power Control Act, 1994*,
3 SNL 1994, Chapter E-5.1 (the “*EPCA*”)
4 and the *Public Utilities Act*, RSNL 1990,
5 Chapter P-47 (the “*Act*”), as amended, and
6 regulations thereunder; and
7
8

9 **IN THE MATTER OF** an application from
10 Newfoundland and Labrador Hydro for approval
11 of revisions to its Cost of Service Methodology
12 pursuant to section 3 of the *EPCA* for use in the
13 determination of test year class revenue requirements
14 reflecting the inclusion of the Muskrat Falls Project
15 costs upon full commissioning.

**PUBLIC UTILITIES BOARD
REQUESTS FOR INFORMATION**

PUB-CA-001 to PUB-CA-006

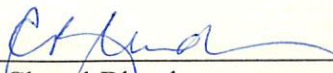
Issued: August 14, 2019

1 **Cost of Service Study Methodology Review**

- 2
- 3 **PUB-CA-001** Reference Prefiled Evidence of C. Douglas Bowman, page 15, lines 15-16:
- 4 (i) Is it possible to utilize the LIL to transmit energy or capacity from
- 5 Churchill Falls generation?
- 6 (ii) Is it possible to utilize the LTA to transmit energy or capacity from
- 7 Churchill Falls generation?
- 8 (iii) Is it possible to utilize the LIL or the LTA to import energy or capacity
- 9 from North American markets?
- 10
- 11 **PUB-CA-002** Reference Prefiled Evidence of C. Douglas Bowman, page 15, lines 18-20:
- 12 Please explain why functionalizing the LIL as transmission means, as Mr.
- 13 Bowman suggests, that it would not be possible to charge market participants
- 14 for all costs associated with connecting their facilities to the network.
- 15
- 16 **PUB-CA-003** Reference Prefiled Evidence of C. Douglas Bowman, page 15, lines 21-24 and
- 17 page 16, lines 1-2: Is it Mr. Bowman's position that if the LIL and LTA are
- 18 functionalized as transmission, the Board is prevented from assigning the costs
- 19 of the LIL and/or the LTA to the IIS?
- 20
- 21 **PUB-CA-004** Reference Prefiled Evidence of C. Douglas Bowman, page 20, lines 20-21:
- 22 (i) Please provide the reasons and evidence that supports the statement.
- 23 (ii) The sentence implies that in the foreseeable future flow will be able to
- 24 flow in both directions, please provide the reasons and evidence that
- 25 supports the implication.
- 26
- 27 **PUB-CA-005** Reference Prefiled Evidence of C. Douglas Bowman, page 23, lines 5-6: Is it
- 28 Mr. Bowman's position that using the system load factor for classification
- 29 purposes does not reflect cost causation?
- 30
- 31 **PUB-CA-006** Reference Prefiled Evidence of C. Douglas Bowman: Does Mr. Bowman
- 32 believe that there is a relationship between the system load factor of a utility
- 33 system and the unit costs? If so, please describe the relationship.

DATED at St. John's, Newfoundland this 14th day of August 2019.

BOARD OF COMMISSIONERS OF PUBLIC UTILITIES

Per  _____
Cheryl Blundon
Board Secretary