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September 14, 2018

The Board of Commissioners of Public Utilities
Ms. G. Cheryl Blundon, Board Secretary
Prince Charles Building
210 - 120 Torbay Road,
St. John's, NL, A1A 2G8

Re: NLH Application for 2019 Capital Budget – RFIs of the Labrador Interconnected Group

Dear Ms Blundon,

Please accept the enclosed requests for information of the Labrador Interconnected Group, numbered LAB-NLH-01 to LAB-NLH-13.

Should you have any questions, please be sure to contact me.

Respectfully,
Olthuis, Kleer, Townshend LLP
PER:

A handwritten signature in black ink, appearing to read 'Senwung Luk'.

SENWUNG LUK
PARTNER

SL/tw

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 2019 capital budget pursuant to s.41(1) of the *Act*;
- 2) its 2019 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 2019 pursuant to s.41(5) of the *Act*; and
- 5) for an Order pursuant to s.78 of the *Act* fixing and determining its average rate base for 2013 and 2014.

Requests for Information

by the Labrador Interconnected Group

LAB-NLH-01 to LAB-NLH-13

September 14, 2018

Requests for Information

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LAB-NLH-01 Re: CBA, v. 1, page A6

- a) Please explain why the Fire Suppression System at Happy Valley needs to be replaced in 2020, and justify the cost of \$986,800.
- b) Please explain the need to inspect the Generator Rotor at Happy Valley in 2020-2021 and justify the cost of \$900,000.
- c) Please explain the need to inspect and refurbish the Power Turbine Clutch at Happy Valley in 2020 and justify the cost of \$200,000.
- d) Please explain the other works planned for the Happy Valley Gas Turbine in the years 2021-2023, and justify the cost.

LAB-NLH-02 Re: CBA, v. 1, page A8

- a) Please provide a list of all Terminal Station works planned for the Labrador Interconnected System for the years 2019 through 2023, inclusive, and for each one, indicate the cost and the reason the works are needed.

LAB-NLH-03 Re: CBA, v. 1, page A9

- a) Please explain why the 2019 CBA indicates that, for the Muskrat Falls Happy Valley Interconnection, \$17,732,000 was expended to 2018, and \$2,247,000 will be expended in 2019.
- b) Of the amounts specified for the Wood Pole Line Management Program – Various, please provide details as to the amounts applicable to the Labrador East and Labrador West systems for each year from 2019 through 2023, and explain why these costs are necessary.
- c) More generally, please provide a list of all Transmission System works planned for the Labrador Interconnected System for the years 2019 through 2023, inclusive, and for each one, indicate the cost and the reason the works are needed.

LAB-NLH-04 Re: CBA, v. 1, page A10

- a) Of the amounts included under Distribution System Upgrades (2018-2019) Various, please indicate the amounts applicable to the Labrador East and Labrador West systems for each year from 2019 through 2023, and explain why these costs are necessary.
- b) Regarding the « Additions for Load – Distribution System – Wabush » indicated for 2019, in the amount of \$186,700, please explain the works involved and why they are needed, and justify the costs.

- 1 c) More generally, please provide a list of all Distribution System works planned for the
2 Labrador Interconnected System for the years 2019 through 2023, inclusive, and for each
3 one, indicate the cost and the reason the works are needed.

4 **LAB-NLH-05 Re: CBA, v. 1, page A13**

- 5 a) Please indicate if any of the Metering equipment mentioned is planned for the Labrador
6 Interconnected System for the years 2019 through 2023, inclusive. If so, please indicate
7 the cost and the reason the works are needed.

8 **LAB-NLH-06 Re: CBA, v. 1, Capital Budget, Detailed Breakdown, page A4 (pdf 186)**

- 9 a) Please indicate what portion, if any, of the « Upgrade Circuit Breakers – Various »
10 budget is planned for the Labrador Interconnected System for 2019, and indicate the cost
11 and the reason the works are needed.

- 12 b) More generally, please provide a list of all Terminal Station works planned for the
13 Labrador Interconnected System for 2019, and, for each one, indicate the cost and the
14 reason the works are needed.

15 **LAB-NLH-07 Re: CBA, v. 1, Capital Budget, Detailed Breakdown, page A5 (pdf 187)**

- 16 a) Please provide a list of all Distribution System works planned for the Labrador
17 Interconnected System for 2019 and, for each one, indicate the cost and the reason the
18 works are needed.

19 **LAB-NLH-08 Re: CBA, v. 1, Capital Budget, Detailed Breakdown, page B3 (pdf 195)**

- 20 a) Please provide a list of all Single-Year Projects over \$50,000 planned for the Labrador
21 Interconnected System for 2019 and, for each one, indicate the cost and the reason the
22 works are needed.

23 **LAB-NLH-09 Re: CBA, v. 1, Capital Budget, Detailed Breakdown, page B5 (pdf 197)**

- 24 a) Please provide a list of all Multi-Year Projects over \$50,000 planned for the Labrador
25 Interconnected System for 2019 through 2022 and, for each one, indicate the cost and the
26 reason the works are needed.

27 **LAB-NLH-10 Re: CBA, v. 1, Capital Budget, Detailed Breakdown, page C2 (pdf 204)**

- 28 a) Please provide a list of all Projects over \$500,000 planned for the Labrador
29 Interconnected System for 2019 and future years and, for each one, indicate the cost and
30 the reason the works are needed.

31 **LAB-NLH-11 Re: CBA, v. 1, Capital Budget, Detailed Breakdown, page C23 (pdf 225)**

- 32 a) Please provide a detailed description and budget for the refurbishment of the Wabush
33 Terminal Station, and explain why the works are needed.

1 b) Please indicate where the Wabush Terminal Station is found in the 2019 Capital Plan,
2 Appendix A (pages 66-83 of the pdf) and in the Capital Budget (pages 183-190 and 193-
3 205 of the pdf).

4 **LAB-NLH-12 Re: CBA, v. 1, page A6**

5 a) Please provide a summary table of planned investments during the period 2019-2023 for
6 the Labrador Interconnected System.

7 **LAB-NLH-13 Re: CBA, v. 2, Terminal Station Refurbishment and Modernization, page**
8 **187-206 of pdf**

9 a) Please indicate the budgets for transformer replacement at Churchill Falls, and any other
10 works on the Labrador Interconnected System described in this document.

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