

1 **IN THE MATTER OF** the Electrical Power
2 Control Act, RSNL 1994, Chapter E-5.1
3 (“EPCA”) and the Public Utilities Act,
4 RSNL 1990, Chapter P-47 (“Act”), and
5 regulations thereunder;

6
7 **AND IN THE MATTER OF** an Application
8 by Newfoundland and Labrador Hydro
9 (“Hydro”) for approval of certain capital
10 projects necessary for the continued
11 operation of the Holyrood Thermal
12 Generation Station (“Holyrood TGS”)
13 pursuant to Subsection 41(3) of the Act.

14 **REQUESTS FOR INFORMATION OF**
15 **THE ISLAND INDUSTRIAL CUSTOMERS GROUP**

16 **IC–NLH-001**

In the April 7, 2020 cover letter to the Application, it is stated that Hydro “...believes the projects are necessary to maintain the Holyrood TGS at full capacity until the LIL assets are proven reliable.”

20 In paragraph 6 of the Application, and again at page 3, lines 3-5,
21 of Schedule 1 to the Application, it is indicated that the capital
22 work which is the subject of the Application is intended to achieve
23 a “short-term extension of the Holyrood TGS to March 31, 2022”.
24 Paragraph 6 of the Application indicates that Hydro came to this
25 view as of February 14, 2020.

26 Given developments since February 14, 2020, does Hydro, as of
27 the date of its response to this request of information, remain of
28 the view that the LIL assets will have been proven reliable by
29 March 31, 2022? If the answer to this question is “yes”, please
30 provide Hydro’s information and understanding, as of the date of
31 its response to this request for information, of the work, testing
32 and commissioning schedule for the integration of the LIL assets
33 with the Island system which could achieve a March 31, 2022
34 proven reliability date.

35 **IC–NLH-002**

In Attachment 1 of the Application, Wood Canada, in correspondence dated 3 April 2020, at page 1, opines:

37 “Overall, Wood Canada believes the HRD is in fair to good
38 condition and capable of reliable and safe operation to end
39 baseload production (year 2021, 2022 or 2023), and to operate in
40 a cold standby mode after that.”

41 Please confirm that Wood Canada is opining in the above-cited
42 passage on the operation of the Holyrood TGS for baseload
43 production potentially continuing into 2023. Did Hydro request that

1 Wood Canada provide an opinion based on baseload production
2 potentially continuing into 2023?

3 **IC-NLH-003** With reference to IC-NLH-002, please confirm that Wood
4 Canada's opinion that "*Overall, Wood Canada believes the HRD*
5 *is in fair to good condition and capable of reliable and safe*
6 *operation to end baseload production (year 2021, 2022 or 2023)*"
7 is based on the completion of the four capital expenditure projects
8 which are the subject of this Application, and not on the
9 completion of any other presently known or anticipated capital
10 expenditures in relation to the HRD (other than, it is
11 acknowledged, further capital expenditures which may be
12 identified as necessary by the Boiler Condition Assessment).

13 **IC-NLH-004** Did Hydro consider any other capital expenditure projects, in
14 relation to maintaining the Holyrood HRD as capable of reliable
15 and safe operation to end baseload production, for inclusion in this
16 Application? If so, have they been only deferred for a future
17 Application?

18 **IC-NLH-005** Is Hydro still anticipating its filing of the Near Term Generation
19 Adequacy Report, in the Reliability and Resource Adequacy Study
20 Review, by May 15, 2020? Will the Near Term Generation
21 Adequacy Report include information, in relation to maintaining
22 the Holyrood HRD as capable of reliable and safe operation to
23 end baseload production, not provided with this Application or in
24 Hydro's responses to the requests for information filed in this
25 Application?

26 **IC-NLH-006** At page i, lines 22-24, Hydro states that:
27
28 *Should aspects of the supplemental projects not be completed*
29 *within this time frame [prior to the 2020-2021 winter season]*
Hydro will inform the Board...and provide mitigation plans.

30 Has Hydro already developed any mitigation plans for this
31 contingency?

32 **IC-NLH-007** With reference to IC-NLH-006, is there any reason why Hydro
33 could not provide monthly updates to the Board, starting one
34 month from approval of the capital expenditure projects which are
35 the subject of this Application, on the ongoing status of the
36 Application, including any slippage in the schedules established
37 for these projects?

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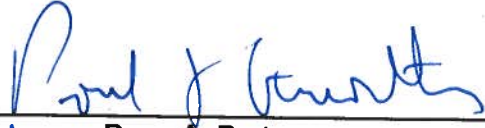

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1 **DATED** at St. John's, in the Province of Newfoundland and Labrador, this 16th day of April,
2 2020.

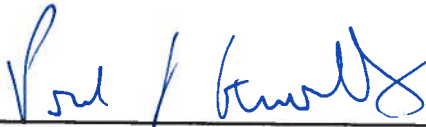

3 POOL ALTHOUSE

4
5 Per: 
6  Dean A. Porter

8 STEWART MCKELVEY

9
10 Per: 
11 Paul L. Coxworthy

12
13 COX & PALMER

14
15 Per: 
16  Denis J. Fleming
17

1 TO: The Board of Commissioners of Public Utilities
2 Suite E210, Prince Charles Building
3 120 Torbay Road
4 P.O. Box 21040
5 St. John's, NL A1A 5B2
6 Attention: Board Secretary

7 TO: Newfoundland & Labrador Hydro
8 Attention: Shirley Walsh

9 TO: Newfoundland Power Inc.
10 Attention: Gerard Hayes

11 TO: The Consumer Advocate
12 Browne Fitzgerald Morgan & Avis
13 Attention: Dennis M. Browne Q.C.

14 TO: Labrador Interconnected Group
15 Olthuis Kleer Townshend LLP
16 Attention: Senwung Luk

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