

# O'DEA, EARLE

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August 26<sup>th</sup>, 2009

VIA E-MAIL & COURIER

Board of Commissioners of Public Utilities  
Ste. E 120, Prince Charles Building  
120 Torbay Road, PO Box 21040  
St. John's, NL A1A 5B2

Attention: Ms. G. Cheryl Blundon, Board Secretary

Ladies & Gentlemen:

Re: Capital Budget Application of Newfoundland & Labrador Hydro

Please find enclosed one (1) original and ten (10) copies (on three hole punched paper) of the Consumer Advocate's Information Requests - CA-NLH-1 to CA-NLH-37.

Copies are also being provided to the parties below. An electronic filing shall also be made in due course with copies to the parties.

Yours very truly,

O'DEA, EARLE



THOMAS J. JOHNSON

TJJ:giq

Enc.

cc. Mr. Geoffrey Young  
Newfoundland & Labrador Hydro

Mr. Gerard Hayes  
Newfoundland Power

Mr. Joseph Hutchings, Q.C.  
Poole, Althouse

Mr. Paul Coxworthy  
Stewart, McKelvey

**IN THE MATTER OF** the *Public Utilities Act*, (the "Act")

**AND IN THE MATTER OF** an Application by Newfoundland and Labrador Hydro for an Order approving: (1) its 2010 capital budget pursuant to s. 41(1) of the Act; (2) its 2010 capital purchases, and construction projects in excess of \$50,000.00 pursuant to s. 41(3)(a) of the Act; (3) its leases in excess of \$5,000.00 pursuant to s. 41(3)(b) of the Act; and (4) its estimated contributions in aid of construction for 2010 pursuant to s. 41(5) of the Act and for an Order pursuant to s. 78 of the Act fixing and determining its average rate base for 2008.

## **CONSUMER ADVOCATE'S INFORMATION REQUESTS**

TO: Board of Commissioners of Public Utilities  
120 Torbay Road  
P.O. Box 21040  
St. John's, NL A1A 5B2  
**Attention: Ms. G. Cheryl Blundon, Board Secretary**

1 CA-NLH-1 Re: Upgrade Plant Access Road - Bay d'Espoir, Vol. I, p. B-10; Vol. II-  
2 Tab 5.

3 (A) Who holds title to the subject road?

4 (B) Who provides snow clearing for the subject road?

5 CA-NLH-2 Re: Upgrade Plant Access Road - Bay d'Espoir, Vol. I, p. B-10; Vol. II-  
6 Tab 5.

7 Given that the road (p. B-11) is used by the general public, including  
8 tourists who visit the plant, has NLH inquired of Government as to  
9 the DOTW's willingness to upgrade the road?

10 CA-NLH-3 Re: Replace Pump House Motor Control Centers-Holyrood, Vol. I, p.  
11 B-12; Vol. II - Tab 6

12 At page 4 of the report at Tab 6 of Vol. II it states:

13 "The motor control centers are located in the main open equipment  
14 area of the pumphouse and are exposed to a damp and corrosive  
15 environment. This environment has caused deterioration to the motor  
16 control centers such as moisture build up and rusting of contacts  
17 which results in an unreliable system and unplanned outages".

18 Does NLH have any records which show that the motor control center  
19 in either pumphouse 1 or pumphouse 2 has been unreliable and/or

1 has caused unplanned outages to the generator units?

2 CA-NLH-4 Re: Replace Pump House Motor Control Centers-Holyrood, Vol. I, p.  
3 B-12; Vol. II - Tab 6

4 What corrosive elements are found in the pumphouse environment?

5 CA-NLH-5 Re: Replace Pump House Motor Control Centers-Holyrood, Vol. I, p.  
6 B-12; Vol. II - Tab 6

7 Should the infeed from Lower Churchill proceed, what will be the  
8 anticipated useful life of the motor control centers?

9 CA-NLH-6 Re: Replace Pump House Motor Control Centers-Holyrood, Vol. I, p.  
10 B-12; Vol. II - Tab 6

11 Has NLH investigated any options for reducing the dampness which  
12 it reports to be experiencing?

13 CA-NLH-7 Re: Replace Pump House Motor Control Centers-Holyrood, Vol. I, p.  
14 B-12; Vol. II - Tab 6

15  
16 Please provide details of the preventative and corrective maintenance  
17 that has been carried out on each of Pumphouse 1's and 2's motor  
18 control center from 2004 to date.

1 CA-NLH-8 Re: Replace Pump House Motor Control Centers-Holyrood, Vol. I, p.  
2 B-12; Vol. II - Tab 6

3 Explain the safety precautions that NLH staff take when individual  
4 cells of the motor control center are removed for maintenance  
5 purposes.

6 CA-NLH-9 Re: Replace Pump House Motor Control Centers-Holyrood, Vol. I, p.  
7 B-12; Vol. II - Tab 6

8 At page 6 of Tab 6, NLH reports that "Replacement parts for the  
9 existing equipment are readily available from local distributors or  
10 through special order direct to the manufacturers". What would it  
11 cost to replace the contacts where rust has been noted?

12 CA-NLH-10 Re: Replace Pump House Motor Control Centers-Holyrood, Vol. I, p.  
13 B-12; Vol. II - Tab 6

14 Does NLH have other buildings and installations that are known to  
15 contain asbestos material.

16 CA-NLH-11 Re: Replace Pump House Motor Control Centers-Holyrood, Vol. I, p.  
17 B-12; Vol. II - Tab 6

18 Does NLH have protocols in place presently (ie. protective measures,  
19 etc.) in regard to the asbestos found in the pumphouses or any of its

1 other sites that contain asbestos?

2 CA-NLH-12 Re: Pole Replacements, Vol. II, Tab 14 - On page 4, NLH provides the  
3 number of poles to be replaced on each of the four lines identified.  
4 What proportion of each line's poles are proposed to be replaced in  
5 this project?

6 CA-NLH-13 Re: Pole Replacements, Vol II, Tab 14 - On page 9, NLH states:

7 "The deteriorated poles identified on each of these lines were  
8 classified as "B" (one to five years of remaining life) condition during  
9 the last inspection in 2006 and are scheduled to be replaced in 2010".

10 Does NLH, as part of its inspection regime, revisit previously  
11 inspected poles to determine if their current condition is consistent  
12 with its previous assigned grade/condition and/or to test the accuracy  
13 of previously assigned grades?

14 CA-NLH-14 Re: Distribution Line Upgrades, Vol II, Tab 12 - On page 7, NLH  
15 states:

16 "Hydro performs inspections on all distribution line components  
17 classifying them using the following standardized grading system:

- 18 • Grade "A" condition: Excess of 5 years of life remaining  
19 • Grade "B" condition: 1 to 5 years of life remaining; and

1 • Grade "C" condition: Less than 1 year of life remaining.

2 Please fully explain how NLH makes the judgement that a  
3 distribution pole is either in Grade "A", "B" or "C" condition with  
4 reference to the indicia used in making that judgement.

5 CA-NLH-15 Re: Distribution Line Upgrades 2010, Vol II, Tab 12., it states at page  
6 7:

7 "The deteriorated components identified in each of these lines, were  
8 classified as "B" condition during the last inspection in 2006 and are  
9 scheduled to be replaced in 2010".

10 (A) Prior to the 2006 inspection, when were these lines last  
11 inspected?

12 (B) What was the classification of these lines when they were  
13 inspected prior to the 2006 inspection?

14 CA-NLH-16 Construct Transmission Line Equipment Off-Loading Areas, Vol II,  
15 Tab 15

16 What is the basis for DOTW's rejection of Hydro's requests to build  
17 off loading ramps along the TCH?

18 CA-NLH-17 Replace Light Duty Mobile Equipment - 2010; Vol II, Tab 21

1 What does "Rep" stand for in the Appendix A?

2 CA-NLH-18 Replace Light Duty Mobile Equipment - 2010; Vol II, Tab 21

3 What is the year, type and mileage of each ATV and snowmobile  
4 being replaced?

5 CA-NLH-19 Replace Light Duty Mobile Equipment - 2010; Vol II, Tab 21

6 What was the cost of each ATV and snowmobile and what does  
7 Hydro expect to get for each upon sale?

8 CA-NLH-20 Replace Light Duty Mobile Equipment - 2010; Vol II, Tab 21

9 How are these ATV's and snowmobiles in Appendix A of Tab 21 (Vol.  
10 II) stored when not in use?

11 CA-NLH-21 Replace Light Duty Mobile Equipment - 2010; Vol II, Tab 21

12 With respect to the ATV's and snowmobiles to be replaced in 2010,  
13 what condition is each in?

14 CA-NLH-22 Replace Light Duty Mobile Equipment - 2010; Vol II, Tab 21

15 With respect to the ATV's and snowmobiles to be replaced in 2010,



1 which were used by Line Crews and which were used by Others?

2 CA-NLH-23 Replace Vehicles and Aerial Devices, Vol. II, Tab 22

3 Why is Unit V1209, with age of retirement of 3.3 kms at 92, 769 being  
4 replaced?

5 CA-NLH-24 Replace Vehicles and Aerial Devices, Vol. II, Tab 22

6 How many vehicles which meet NLH's replacement criteria are not  
7 being replaced in 2010?

8 CA-NLH-25 Install Diesel Fuel Tank Monitoring System at Ebbengunbaeg, Vol. I,  
9 p. c. 43

10 Subsection 18 2 (a) of GAP (referred to at p. c-45) contemplates that  
11 the Minister may accommodate remote installations by decreasing the  
12 frequency of dips relative to the weekly standard. Has NLH sought  
13 the Minister's approval for bi-weekly dips given the remote location  
14 in this instance?

15 CA-NLH-26 Install Diesel Fuel Tank Monitoring System at Ebbengunbaeg, Vol. I,  
16 p. c. 43

17 How old are the bulk and 900 liter day storage tanks and of what  
18 material are they constructed?

1 CA-NLH-27 Install Diesel Fuel Tank Monitoring System at Ebbengunbaeg, Vol. I,  
2 p. c. 43

3 If there were to be a sudden and catastrophic failure of either tank,  
4 where would the oil end up?

5 CA-NLH-28 Install Warm Air Make-up Access, Vol. II, p. D-6

6 What is the Remote Access Technology rescue team and are they  
7 hired each time a NLH employee enters into the Warm Air Make Up  
8 Enclosures?

9 CA-NLH-29 Install Warm Air Make-up Access, Vol. II, p. D-6

10 Has NLH had to have a rescue operation undertaken since 1992 when  
11 these enclosures were built?

12 CA-NLH-30 Upgrade Fire Protection System - Bishop's Falls, Vol. I, p. D-57

13 Please provide a copy of the FM Global Report referenced at p. D-57.

14 CA-NLH-31 Re: Plant Life Extension Upgrades, Vol. II, Tab I.

15 At page A2 it states in the Stantec Final Report: "Since HYDRO was unable

1 to provide any historical electrical testing data or visual inspection  
2 information on the alternator at either site, it was not possible to assess the  
3 current condition of either alternator and determine the extent of remedial  
4 work required...”. Has Hydro conducted a thorough inspection of the stator  
5 and rotor in order to determine whether refurbishment or replacement is  
6 required?

7 CA-NLH-32 Re: Upgrade Distribution Systems, Vol. I, page B-20

8 Please provide a breakdown of historic expenditures as they relate to  
9 preventative maintenance verses unknown yearly occurrences such as damage  
10 caused by storms, adverse weather conditions etc.

11 CA-NLH-33 Re: Construct Transmission Line Equipment Off-Loading Areas, Vol I, Tab  
12 15.

13 Please advise as to what utilities in other jurisdictions have projects similar  
14 in nature regarding off-loading areas.

15 CA-NLH-34 Re: Replace Light Duty Mobile Equipment, Vol. II, Tab 21.

16 At page 5, in the section entitled ‘4.4 Status Quo’, it states: “Failure to  
17 replace units in accordance with the replacement policy will lead to  
18 increasing maintenance costs and less reliable vehicles.” However, at page

1 3 it states: "Hydro does not maintain maintenance records for this type of  
2 equipment to this level of detail.

3 Why does Hydro not keep detailed maintenance records of Light Duty Mobile  
4 Equipment?

5 CA-NLH-35 Re: Stationary Battery and Charger Replacement Program, Vol II, Tab 23.

6 Why are the 48V Batteries at Deer Lake, Hinds Lake and Happy Valley being  
7 replaced when their capacity has not fallen to eighty percent (80%) of its  
8 rated capacity as recommended by IEEE standards 450 and 1188, the  
9 standard referenced at page B-50 at Vol I.?

10  
11

12 CA-NLH-36 Re: PC Replacement Program, Vol I.

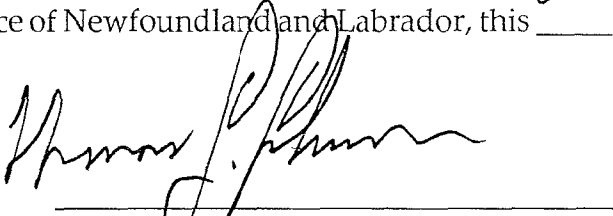
13 At page C-153 under the heading 'Status Quo' it states that new applications  
14 may not run on the old hardware platform. Can Hydro determine whether the  
15 desktop computers recommended for replacement are able to effectively run  
16 the software upgrades and operating system proposed under the new  
17 Microsoft Enterprise Agreement?

18 CA-NLH-37 Re: PC Replacement Program, Vol. I.

19 At page C-153 it states that maintenance agreements will not be offered by

1 the vendor. Can Hydro advise as to whether the desktop computers  
2 recommended for replacement can be maintained and serviced by third party  
3 technicians?  
4

5 **DATED** at the Cit of St. John's, in the Province of Newfoundland and Labrador, this 25<sup>th</sup>  
6 day of August, 2009



**CONSUMER ADVOCATE**

**Thomas Johnson**

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14 CEL F:\OE\Consumer Advocate\RFI's August 24 2009.wpd