

IN THE MATTER OF the *Public Utilities Act*, R.S.N.L., c.P-47 (the "Act")

And

IN THE MATTER OF capital expenditures and rate base of Newfoundland Power Inc.;

And

IN THE MATTER OF an Application by Newfoundland Power Inc. for an order pursuant to Sections 41 and 78 of the Act:

- (a) approving its 2011 Capital Budget of \$72,969,000; and
- (b) fixing and determining its 2009 rate base at \$848,493,000

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

CA-NP-01 Re 2011 PCB Removal Strategy - on page 8 of Tab 2.3 reference is made to a letter dated May 11, 2010 from the CEA to Environment Canada. Please provide a copy of this letter.

- CA-NP-02 Please provide an update as to any communications that have taken place as between the CEA and Environment Canada since the May 11, 2010 letter referred to in the previous question, and please indicate when a reply to the CEA proposal is expected.
- CA-NP-03 At page 8 of Tab 2.3, it states that if the requested CEA amendment is accepted, and the deadline for dealing with the equipment is extended until 2025, the phase-out can be completed over a 15 year period (2011-2025). It is then stated that, "This longer timeframe would put the Company in a better position to meet Environment Canada's regulatory requirements without drastically impacting the Company's annual capital budget expenditures." Please compare the capital budget estimates for completing the testing and expected remediation work prior to this 2014 deadline with the more gradual (2011-2025) phase-out.
- CA-NP-04 In light of the fact that the CEA's proposal to Environment Canada is apparently pending a response at this time, what consideration has NP given to how that uncertainty should be managed from the perspective of proceeding with the proposed \$1,500,000 project or adjusting the same having regard to the normal maintenance cycle or adjusting the normal maintenance cycle.
- CA-NP-05 Re Street Lighting (Pooled) - Schedule B - pp. 36-38
As regards the replacement of existing fixtures, please indicate whether the company has a programme in place to ensure that existing lighting fixtures which have failed are replaced on a timely basis and provide details as to

how any such programme operates.

CA-NP-06 Re Street Lighting (Pooled) - Schedule B - pp. 36-38

Newfoundland Power's Schedule of Rates, Rules and Regulations effective July 1, 2010 in Regulation 6 states that:

“(a) For Street and Area Lighting Service the Company shall use its best efforts to provide illumination during the hours of darkness for a total of approximately 4,200 hours per year. The Company shall, subject to Regulation 9 (i) make all repairs necessary to maintain service.”

How does NP ensure that it is adhering to this standard of service?

CA-NP-07 Re Street Lighting (Pooled) - Schedule B - pp. 36-38

Newfoundland Power's Schedule of Rates, Rules and Regulations effective July 1, 2010 in Regulation 6 states that:

“(a) For Street and Area Lighting Service the Company shall use its best efforts to provide illumination during the hours of darkness for a total of approximately 4,200 hours per year. The Company shall, subject to Regulation 9 (i) make all repairs necessary to maintain service.”

Does NP have a means of tracking the percentage of street lights throughout its service territory which are actually maintained to this standard?

CA-NP-08 Re 2011 Application Enhancements - Schedule B - pp. 84-85 and Tab 5.1.

In the 2011 CBA there are application enhancements proposed which include Meter Reading Improvements, Electrical Engineering Software

enhancements, Work Dispatch Improvements, Customer Service Internet and Energy Conservation Website enhancements, totaling \$983,000.00. In the 2010 CBA (see Schedule B, pp. 80-81 and Tab 6.1) there were application enhancements proposed which related to Customer Interaction, Meter Management, Customer Finance Plan Enhancements, Operations and Engineering Systems Enhancements, Work Scheduling and Tracking Enhancements, Third Party Contract Management, Document Management Improvements, Customer Service Internet Enhancement and Energy Conservation Website Enhancements, totaling \$937,000.00.

In the 2009 CBA (Schedule B, pp. 65-66 and Tab 5.1) expenditures totaling \$1,458,000 were proposed for inter alia Customer Contact, Customer Billing, and Credit Management Enhancements, Operations and Engineering Systems Enhancements and Customer Service Internet Enhancements.

Does NP have an overall plan which sets out the goals it is intending to reach in relation to these various capabilities and a timeline and budget for their attainment?

CA-NP-09 Re 2011 Facility Rehabilitation - p. 2 - 3 of 100 - Tab 1.1

Heart's Content Seal Cove Pond Improvements. Please provide a copy of any dam safety inspection reports in respect of this structure since 2006.

CA-NP-10 Re 2011 Facility Rehabilitation - p. 2 - 3 of 100 - Tab 1.1

Heart's Content Seal Cove Pond Improvements. Does NP have any recent photos of the existing rock filled timber crib dam referred to at p. 1 of the

report at Tab 1.1?

CA-NP-11 Re Rattling Brook Dam Refurbishment - p. 6-7 of 100 - Tab 1.3

The total estimated cost for the replacement of Rattling Brook Spillway with a gravity overflow labyrinth spillway is stated to be \$1,800,000.00 (Tab 1.3, p. 5). Is this cost estimate based on Hatch's cost estimate of April 2007 (found in Appendix A to Tab 1.3) and if so, is that estimate still reliable?

CA-NP-12 Re Rattling Brook Dam Refurbishment, Tab 1.3

At page 1 of the report there is a reference to a \$4.5 million project in the capital plan for 2012 to design and construct facilities to allow salmon to access the Rattling Brook watershed. What is the basis for the requirement to construct these facilities in 2012?

CA-NP-13 Re Rattling Brook Dam Refurbishment, Tab 1.3

At page 1 of the report it indicates that uncertainty around the requirements for fish passage delayed work on the Rattling Brook spillway. On what basis did NP decide that the work on the spillway could reasonably be deferred pending the outcome of discussions with DFO?

CA-NP-14 Re Rattling Brook Dam Refurbishment, Tab 1.3

What maintenance has taken place on the Rattling Brook spillway since 2005?

CA-NP-15 Re 2011 Substation Refurbishment and Modernization - p. 16-17 of 100, Tab 2.1

At p. 1 of Tab 2.1 it states, "In 2011, the budget estimate is materially below

this level [i.e. \$4 million] due to a requirement to address government regulations concerning. . . (PCB). Such developments highlight the practical requirement for flexibility in execution of the Substation Refurbishment and Modernization project over time”.

Specifically which work was delayed or deferred beyond this CBA as a result of the PCB requirements cited?

CA-NP-16 Re 2011 Substation Refurbishment and Modernization - p. 16-17 of 100, Tab 2.1

At p. 1 of Tab 2.1 it states, “In 2011, the budget estimate is materially below this level [i.e. \$4 million] due to a requirement to address government regulations concerning. . . (PCB). Such developments highlight the practical requirement for flexibility in execution of the Substation Refurbishment and Modernization project over time”.

Are there projects besides Substation Refurbishment and Modernization in this CBA which are flexible as regards execution of the project over time.

CA-NP-17 Relocate/Replace Distribution Lines for Third Parties pp. 48-49 of 100.

Please provide the pertinent contract language as regards requests for relocation and replacement of distribution facilities by governments and other utility service providers.

CA-NP-18 Relocate/Replace Distribution Lines for Third Parties pp. 48-49 of 100.

What are the estimated contributions from customers and requesting parties associated with this project?

- CA-NP-19 Relocate/Replace Distribution Lines for Third Parties pp. 48-49 of 100.
At p. 49 it indicates that for certain projects, costs less betterment were recovered from Eastlink. In relation to these referenced projects, please detail the amounts recovered from Eastlink and please explain how the concept of betterment was both defined, quantified and reflected in the recoveries for these projects.
- CA-NP-20 Re Distribution Reliability Initiative, p. 50-52, Tab 4.1.
Table 1 of the report at Tab 4.2 shows that for 2009 the NWB-02 feeder experienced SAIDI of .48 and SAIFI of .26. In the past the Company has deferred DRI projects (for example, in 2007 on account of the Rattling Brook project). Explain why this \$521,000 project cannot be deferred in light of the most recent reliability statistics available.
- CA-NP-21 Re Distribution Reliability Initiative, p. 50 - 52, Tab 4.1
Which DRI projects were not included in the 2007 CBA and instead undertaken in 2008 and what were these feeders' SAIDI and SAIFI statistics in 2006 and 2007.
- CA-NP-22 Re Kenmount Road Building Entrance Renovation (other) pp. 69-71
Please provide copies of the recent inspection reports, if any, that have concluded that continued maintenance is no long feasible, as stated at p. 69 of 100.
- CA-NP-23 Re Purchase Vehicles and Aerial Devices
Please provide a copy of NP's tender call(s) for vehicles and aerial devices

acquired in 2010.

- CA-NP-24 Re Purchase Vehicles and Aerial Devices
Does NP purchase new previous years' models when replacing vehicles in its fleet?
- CA-NP-25 Re Purchase Vehicles and Aerial Devices
What are the years of, the milage of and make of the vehicles proposed for replacement in 2011?
- CA-NP-26 Vehicle Mobile Computing Infrastructure p. 95-96 of 100
Does the project cost of \$178,000 include the cost of the expansion of network and security infrastructure required for these additional laptops or were these costs covered under the 2010 project?
- CA-NP-27 Re Sandy Brook Plant Refurbishment (other) p. 10 of 100 and Tab 1.4
In NP's 2010 Capital Plan 2010-2014 found at page A-2 of the 2010 CBA there was no capital work planned for the Sandy Brook plant until the year 2014, at which time it was estimated that \$825,000 would be incurred for "Sandy Brook Governors P & C". Please provide a copy of any assessments/reports which were used by NP to determine that capital work was not required at the Sandy Brook Plant until 2014.
- CA-NP-28 Re Sandy Brook Hydro Plant Refurbishment (other) p. 10 of 100 and Tab 1.4.
The report at Tab 1.4 is based upon an inspection completed on March 4, 2010. Specifically what new information came to the attention of NP on

March 4, 2010 that was not known to it in June of 2009 when the Company stated that work on Sandy Brook would be taking place in 2014?

CA-NP-29 Re Sandy Brook Hydro Plant Refurbishment (other) p. 10 of 100 and Tab 1.4.
Please provide plant availability statistics for the Sandy Brook Plant for the past 5 years.

CA-NP-30 Re 2011 Capital Plan, p. A-2
In NP's 2011-2015 Capital Plan for Generation there is no mention of the Victoria Hydro Plant Refurbishment over this time period whereas in the 2010 Capital Plan filed with last year's CBA the Victoria Hydro Plant Refurbishment was expected to be done in 2011 at a cost of \$2.498 million. Please provide a copy of NP's engineering assessment(s)/report(s) that supports deferring this project from 2011 as previously planned to some point beyond 2015 as is apparently now the plan of NP.

CA-NP-31 Re 2011 Capital Plan, P. A-2
In NP's 2011-2015 Capital Plan for Generation a project for the 2011 Horse Chops Generator Rewind is proposed. In last year's 2010-2014 Generation Capital Plan, the Horse Chops Generator Rewind was not planned for any year during that planning period--. Please explain why this project is being accelerated?

CA-NP-32 Re 2011 AMR Project, Tab 4.3
Graph 1 shows the Meter Reading Operating Cost from 2000 - 2009. What are the types of costs included under this heading?

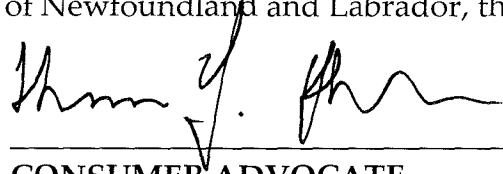
- CA-NP-33 Re 2011 AMR Project, Tab 4.3
Can the conventional meters which are being replaced by the AMR meters be re-used or re-conditioned?
- CA-NP-34 Re 2011 AMR Project, Tab 4.3 (at p. 3)
Please provide a breakdown of the estimated savings of \$49,800 per year referred to in section 3.0 of the report.
- CA-NP-35 Re 2011 AMR Project, Tab 4.3 (at p. 3)
Will NP have a means of verifying the amount of savings, if any, actually achieved on a yearly basis from this project?
- CA-NP-36 Re AMR Project, Tab 4.3 (at p. 3)
What are the operational assumptions being made by NP that lead it to conclude that there shall be savings of \$49,800 per year for this project?
- CA-NP-37 Reconstruction (Pooled) p. 43-44 of 100. Table 2 on page 44 of 100 indicates that estimated expenditures in 2010 are \$4,421,000 which includes \$1,062,000 for the March storm on the east coast. How was the March storm event's expenses treated from a regulatory perspective.
- CA-NP-38 Tools and Equipment (Pooled) p. 60-62 of 100. As regards the Substation Grounding Sticks, are these to replace deteriorated grounding sticks or are these additional sticks?
- CA-NP-39 Re Bill Inserter for Production Centre (other) p. 72-73 of 100

Has NP inquired as to whether the same or another manufacturer can supply a refurbished unit?

CA-NP-40 Re Allowance for Unforeseen Items (other) p. 98 of 100.

Please outline what this allowance was used for in 2010 thus far.

DATED at the Cit of St. John's, in the Province of Newfoundland and Labrador, this 12th day of August, 2010

A handwritten signature in black ink, appearing to read 'Thomas J. Johnson', written over a horizontal line.

CONSUMER ADVOCATE

Thomas Johnson

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