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 2012 Capital Budget of \$77,293,000;
- (b) approving certain leases to be entered into in 2012;
- (c) approving certain capital expenditures related to multi-year projects commencing in 2012; and
- (d) fixing and determining a 2010 rate base of \$875,210,000

CONSUMER ADVOCATE'S INFORMATION REQUESTS

TO: The 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 Please provide NP's annual capital expenditures from 2004 to 2016 (f), expressed in actual and 2011 dollars as appropriate.
- CA-NP-02 At page 1 of the Capital Plan, NP characterizes the 2012 Capital Budget as "... part of a series of stable and predictable annual capital budgets..." Does NP employ any guidelines as to the overall quantum of its annual capital budget requests to the Board? If yes, please explain the guidelines employed and if not, explain why guidelines are not employed by NP.
- CA-NP-03 Re: Portable Substation (Report 2.4). At page 14 of the Report the recommendation given is the purchase of a new 50 MVA portable substation at an estimated cost of \$4,500,000. What is the estimated cost of a new 25 MVA portable substation?
- CA-NP-04 Re: Portable Substation: The report at Tab 2.4 states that (p.14) of NP's 147 Station Power and Distribution Power Transformers, 92% (or 135) can be backed up by NP's 50 MVA portable substation (P4). On p. 9, it states that P3 is capable of providing back up to 87% (or 128). On what basis is NP proposing the purchase of a 50 MVA portable substation?
- CA-NP-05 Portable Substation. Has NP investigated the options of purchasing a refurbished portable

substation?

- CA-NP-06 Re: Portable Substation. Please confirm that the evidence set out in the Report at Tab 2.4 does not address whether a new 50 MVA portable substations would be the least cost alternative when compared to a new or refurbished lower capacity portable substation.
- CA-NP-07 Re: Portable Substation. Please restate Table 1 at p.8 including data applicable to Hydro's recently refurbished P2.
- CA-NP-08 Please restate Figure 6 at p.9 to include NP's usage of Hydro's P2.
- CA-NP-09 Re: Portable Substation. Please provide details of NP's use of Hydro's P2 from 2007 to 2011(f).
- CA-NP-10 Please provide details of Hydro's use of P1, P2, P3 and P4 from 2007 to 2011 (f).
- CA-NP-11 Re: Generation Hydro Lockston Plant Refurbishment. (P.8-9 of 90); Please provide plant availability statistics of this facility over past 10 years.
- CA-NP-12 Re: Generation Hydro Lockston. Is it not possible to defer this project?
- CA-NP-13 Re; Generation Hydro Lockston. Please indicate where in the report filed at Tab 1.3 entitled, "Lockston Hydro Plan Refurbishment" there is a discussion or analysis of the possibility of deferring this project.
- CA-NP-14 Re: 2012 Application Enhancement (Report 6.1). Please details all projected operating cash savings which the company expects to achieve through the proposed 2012 Application Enhancements.
- CA-NP-15 At page 18 (of 90) in Schedule "B" of the Substations section, what is the rationale for the termination of a new feeder at the Kelligrews substation at a cost of \$148,000.00? This project is not addressed in the Report at tab 2.2.
- CA-NP-16 At page 31 (of 90) in Schedule "B" of the Distribution section, reference is made to economic projections provided by independent agencies for new customers. Please provide copies of all projections relied upon and explain how the company's projection of new customers was derived.
- CA-NP-17 In the 2012 Capital Plan, Distribution capital projects that involve installation of new joint use support structures have been adjusted to reflect Bell Aliant assuming 40% ownership of the joint use structures in 2011. As this sale was not approved, how will NP's 2012 Capital Plan and its application be affected?
- CA-NP-18 At Tab 1.3, Lockston Hydro Plant Refurbishment, at page 11, it is outlined that index testing on unit G1 was performed in 2003 by ACRES. The peak efficiency was 84.4%, and is

considered low compared to modern runner design. What is considered to be efficient in modern runner design?

- CA-NP-19 Will the Transmission Line Rebuild (Tab 3.1) cause disruption to customers?
- CA-NP-20 At page 68 (of 90) in Schedule "B" of the Transportation section, please provide the make, model, year and odometer readings of the vehicles sought to be replaced in 2012.
- CA-NP-21 At Tab 1.3, Lockston Hydro Plan Refurbishment, at page 11, it is outlined that index testing on unit G1 was performed in 2003 by ACRES. The peak efficiency was 84.4% and is considered low compared to modern runner design. What is considered efficient in modern runner design?

DATED at St. John's, in the Province of Newfoundland and Labrador, this 8th day of August, 2011.

THE CONSUMER ADVOCATE

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