

IN THE MATTER OF the *Public Utilities Act*, RSNL 1990, Chapter P-47 (the Act) as amended; and

IN THE MATTER OF an Application by Newfoundland and Labrador Hydro for an Order approving: (1) 2013 Capital Budget pursuant to Section 41(1) of the Act; (2) its 2013 capital purchases, and construction projects in excess of \$50,000 pursuant to Section 41(3)(a) of the Act; (3) its leases in excess of \$5,000 pursuant to Section 41(3)(b) of the Act; and (4) its estimated contributions in aid of construction for 2012 pursuant to Section 41(5) of the Act and for an Order pursuant to Section 78 of the Act fixing and determining its average rate base for 2011.

REQUESTS FOR INFORMATION OF THE ISLAND INDUSTRIAL CUSTOMERS

IC-NLH-54 2013 Wood Pole Line Management (WPLM), Appendix B. At page B4, Hydro identifies one of the four objectives of the WPLM program to be to “develop and implement an electronic data collection system to facilitate field data collection and subsequent data analysis”:

(a) Has this been an objective of the WPLM program since its inception in 2005?

(b) How much of the Board-approved capital expenditures since the inception of the WPLM program in 2005 has been expended on this objective?

(c) What has been achieved to date in implementing this objective?

(d) What is left to achieve to implement this objective?

IC-NLH-55 2013 Wood Pole Line Management (WPLM). In Order P.U. 2 (2012), the Board stated “*However, given that the program has been in place for six years, the Board is of the view that there should be sufficient data and experience to provide a more comprehensive report on the benefits of the program to ratepayers.*” The Board identified, for example, that Hydro’s report should provide evidence of the results of non-destructive testing undertaken to date.

(a) At page B5, Appendix B, Hydro acknowledges that the Board expected evidence of the results of non-destructive testing undertaken to date to be provided by the Appendix B report, but on the same page this expectation is not referred to as one of the specific areas addressed by the report. Why has this Board expectation not been addressed?

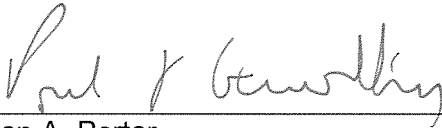

- 1 (b) At page 9 of Appendix A (Tab 17, Volume II, 2013 Capital Budget
2 Application), Hydro states that “*a general assessment of the large*
3 *pole numbers at the field that are inspected annually with some*
4 *non-destructive (NDE) evaluation technique is needed*”. Has not
5 this need been recognized by Hydro since 2005? When will this
6 need be met?
- 7 (c) With reference to page 9 of Appendix A, please describe the
8 current equipment used for NDE, how long it has been in use in
9 the WPLM program, and to what extent it has been used (i.e.,
10 has the current NDE equipment been used for each pole
11 inspected since the 2005 program inception, and if not, how has
12 its extent and frequency of use been planned and implemented)?
13 For how long has it been known that current equipment used for
14 NDE “does not produce consistent results”? How has it been
15 determined that the results of current NDE have not been
16 consistent – compared to what? Why has the current equipment
17 not produced consistent results?
- 18 (d) Does the lack of NDE equipment producing consistent results
19 mean that the NDE data that would have been otherwise gained
20 by the NDE inspection of lines since 2005 has been lost?
- 21 (e) Has Hydro undertaken any inquiries of the NDE techniques and
22 equipment used by other utilities across North America?
- 23 **IC-NLH-56** 2013 Wood Pole Line Management (WPLM), Appendix B. At page B6,
24 Hydro presents outage data for Hydro’s Transmission Line Network as a
25 whole (Figure 2a). Provide a breakdown of the outage hours for the years
26 1993 – 2011, identifying
- 27 (a) the total outage hours for each year,
- 28 (b) the transmission lines (identified by number and by geographical
29 location) in each year where pole damage or pole failure was the
30 cause of outage hours, and
- 31 (c) for each of the transmission lines identified in response to (b)
32 above, the number of outage hours in each year caused by pole
33 damage or pole failure on that line.
- 34 **IC-NLH-57** 2013 Wood Pole Line Management (WPLM), Appendix B. At pages B6-7,
35 were all of the mean outage hours in figures 2a, 2b and 2c caused by
36 pole damage or pole failure on a Hydro transmission line? If not, please
37 present figures 2a, 2b, and 2c with mean outage hours based only on
38 pole damage or pole failures on Hydro transmission lines.
- 39 **IC-NLH-58** Has Hydro implemented any operational measures or capital projects
40 since 1993, other than the WPLM program, aimed at improving outage
41 statistics for its Transmission Line Network? If yes, please identify and
42 describe the other operational measures or capital projects.

- 1 **IC-NLH-59** 2013 Wood Pole Line Management (WPLM), Appendix B. At page B8,
 2 Hydro presents its ratio of average annual maintenance cost over
 3 replacement asset value as 0.32.
- 4 (a) From what period of years has this ratio of 0.32 been calculated?
- 5 (b) Provide the same ratio, annually, for each year for the period 1993
 6 to 2011.
- 7 (c) Has the annual capital cost of the WPLM program, since 2005,
 8 been included in the "annual maintenance cost" factor used to
 9 calculate this ratio? If not, then recalculate and present the ratio
 10 for each year in the period 2005-2011, by including the respective
 11 annual capital cost of the WPLM program in the "annual
 12 maintenance cost" for that year.
- 13 **IC-NLH-60** 2013 Wood Pole Line Management (WPLM), Appendix B. At page B8,
 14 Hydro states that its review of utilities' best practices indicates that most
 15 other utilities have a regular inspection program and preventative
 16 treatment program.
- 17 (a) Provide a copy of the recent CEATI survey referred to as support
 18 for the foregoing statement.
- 19 (b) Apart from the information in the CEATI survey, does Hydro have
 20 any other information about the extent and scope of the "regular
 21 inspection program" and "preventative treatment programs"
 22 implemented by other utilities, as compared to Hydro's WPLM
 23 program? If yes, provide that other information and any published
 24 sources for that information.
- 25 (c) What is meant by the qualification "when one considers the
 26 variability in climatic conditions" when Hydro states that its'
 27 "replacement rate and the expected mean life is also in line with
 28 other utility data"? How does Hydro accurately quantify the
 29 "variability in climatic conditions" to allow objective comparisons
 30 with other utility data?
- 31 **IC-NLH-61** 2013 Wood Pole Line Management (WPLM), Appendix B. At page B9,
 32 Hydro presents in Figure 3 a comparison with other utilities data. Which
 33 U.S. states are included in the "Northern US" data presented in Figure 3?
- 34 **IC-NLH-62** 2013 Wood Pole Line Management (WPLM), Appendix B. At page B9,
 35 Hydro compares its pole replacement rate to the "published data of 0.5
 36 percent to 0.7 percent per year for the west coast of North America".
- 37 (a) Provide a copy of the published data, as published, for the west
 38 coast of North America referred to above.
- 39 (b) Over what period has Hydro's pole replacement rate been 0.33
 40 percent per year?

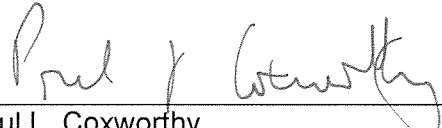
- 1 (c) What has been Hydro's pole replacement rate in each year in the
2 period 1993-2011?
- 3 **IC-NLH-63** 2013 Wood Pole Line Management (WPLM), Appendix B. At page B13,
4 Hydro presents in Figure 6 a comparison of costs of an unplanned
5 replacement and planned replacement of a pole. Does the cost of a
6 planned replacement of a pole as presented in Figure 6 include any
7 allocation for the costs of the WPLM program?
- 8 **IC-NLH-64** Provide, for each year starting from 2005, Hydro's "planned replacement
9 costs" for transmission line poles. Provide, for each year starting from
10 2005, Hydro's "unplanned replacement costs" for transmission line poles.
- 11 **IC-NLH-65** 2013 Wood Pole Line Management (WPLM), Appendix B. At page B14,
12 does Hydro's presentation in figure 7 of "planned maintenance cost"
13 include an estimate or projection of "planned replacement costs" for
14 poles? For "unplanned replacement costs" for poles?
- 15 **IC-NLH-66** 2013 Wood Pole Line Management (WPLM), Appendix B. At page B15,
16 Hydro, in a section entitled "Non-destructive Tests", presents in figure 8
17 information regarding primary defects found during inspections of the
18 Avalon Pole System for the period 2003-2011. At page 9 of the Appendix
19 A report, Hydro has stated that current equipment used for NDE "does not
20 produce consistent results". Is the information presented in figure 8
21 based, in whole or in part, on results from NDE that are not consistent?

DATED at St. John's, in the Province of Newfoundland and Labrador, this 10th day of September, 2012.

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