

POOLE ALTHOUSE
BARRISTERS AND SOLICITORS

Jamie Merrigan, Q.C.
Dean A. Porter
J. Annette Bennett
Margaret C. Hepditch

Robby D. Ash
Glen G. Seaborn
Melissa May

Adam G. Baker
Jonathan M. Andrews
Giselle Jones

Toll Free: 1 877 634-3136
E-Mail: info@poolealthouse.ca
www.poolealthouse.ca

■ CORNER BROOK
Telephone: 709 634-3136
Fax: 709 634 8247/9815
Western Trust Building
49-51 Park Street
Corner Brook, NL
Canada A2H 2X1

Edward P. Poole, Q.C., Retired
D. Paul Althouse, Q.C., Retired

Happy Valley-Goose Bay
Telephone: 709 896-8777
Fax: 709 896-8779
49A Grenfell Street
PO Box 1450, Station B
Happy Valley-Goose Bay, NL
Canada A0P 1E0

November 9, 2015

Via Electronic Mail & Courier
Newfoundland and Labrador Board
of Commissioners of Public Utilities
120 Torbay Road
P.O. Box 21040
St. John's, NL A1A 5B2

**Attention: Ms. G. Cheryl Blundon
Director of Corporate Services and Board Secretary**

Dear Ms. Blundon:

**Re: Newfoundland and Labrador Hydro – Application for 2016 Interim Industrial Rates
Requests for Information IC-NLH-01 to IC-NLH-08**

Please find enclosed the original and twelve (12) copies of the Requests for Information of the Island Industrial Customers Group in relation to the above noted Application.

A copy of the letter, together with the enclosures, has been forwarded directly to the parties listed below.

We trust you find the foregoing satisfactory.

Yours very truly,

POOLE ALTHOUSE


Dean A. Porter

DAP/lp
Enclosure

J:\Clients\4648-13\Blundon ltr 10.doc

cc: Mr. Geoffrey P. Young, Senior Legal Counsel, Newfoundland and Labrador Hydro
Mr. Thomas J. Johnson, Consumer Advocate
Mr. Gerard Hayes, Newfoundland Power
Mr. Paul Coxworthy, Stewart McKelvey
Mr. Thomas J. O'Reilly, Q.C., Vale Newfoundland and Labrador Limited
Ms. Nancy Kleer, Olthuis, Kleer, Townshend LLP
Mr. Ed Hearn, Q.C., Miller & Hearn
Ms. Yvonne Jones, MP, House of Commons
Mr. Dennis Browne, Q.C., Browne Fitzgerald Morgan & Avis
Ms. Genevieve Dawson

1 **IN THE MATTER OF** the *Public*
2 *Utilities Act*, R.S.N. 1990, Chapter
3 P-47 (the "Act"); and

4
5 **IN THE MATTER OF** a General Rate
6 Application by Newfoundland and Labrador
7 Hydro to Establish Customer Electricity Rates
8 for 2015; and

9
10 **IN THE MATTER OF** an Application (the "2016 Interim Industrial
11 Rates Application") by Newfoundland and Labrador Hydro
12 for Approval of Interim Industrial Customer Rates, Tolls and
13 Charges and RSP Rules.

17
18
19
20
21
22 **ISLAND INDUSTRIAL CUSTOMERS GROUP**
23 **REQUESTS FOR INFORMATION**
24 **IC-NLH-01 to IC-NLH-08**
25 **Issued November 9, 2015**

26
27

1 IC-NLH-01 With regard to Schedule 4 of the Application, please confirm that the loads
2 used to generate the Schedule for 2015 are the GRA forecast loads.

3

4 IC-NLH-02 With regard to Schedule 4 of the Application, please provide the date of
5 the load forecast used to generate the 2016 drawdown estimates and
6 confirm whether this is the most recent load forecast information available
7 to Hydro?

8

9 IC-NLH-03 Please provide the latest load forecast information available to Hydro for
10 2015, 2016, and 2017 (including actuals as available and the most recent
11 forecasts for the remainder) for all Island customers, in the format of IC-
12 NLH-028.

13

14 IC-NLH-04 Please provide a comparison of the load forecast provided in response to
15 IC-NLH-03 above to the values in the response to NP-NLH-011 Rev 2
16 (only "Schedule II – Extension")

17

18 IC-NHL-05 Please confirm, on the basis of the updated information in items 11 and 12
19 at pages 4-5, that as part of the GRA, Hydro is now seeking a Test Year
20 2015 fuel price equal to \$64.41/bbl (including for the purposes of setting
21 the NP second block rate). If this is not correct, please provide Hydro's
22 proposed 2015 Test Year fuel price for use in the GRA (and establishing
23 the NP second block rate) and indicate whether (and if so when), Hydro's
24 proposed 2015 Test Year Fuel Price will be further updated as part of the
25 GRA process.

26

27 IC-NLH-06 Please provide a calculation of the \$64.41/bbl price (broken out monthly).

28

29 ID-NLH-07 In Mr. Fagan's testimony of October 5, 2015 (pages 97-98), Mr. Fagan
30 notes that the 2016 fuel price forecast was likely to be close to \$70/bbl,
31 and points to PUB-NLH-485 as a reasonable new estimate of rates given

1 that the response to PUB-NLH-485 was calculated based on a Test Year
2 fuel price of \$73.35/bbl (which is close to \$70/bbl) (Ref: page 98 lines 15-
3 23). Please confirm that the October 28, 2015 Interim Rates Application
4 now updates the 2015 Test Year Fuel Price to \$64.41/bbl (per item 12,
5 page 5) and provide an updated version of PUB-NLH-485 to reflect this
6 fuel price for the 2015 Test Year.

7

8 IC-NLH-08 With regard to Item 13, page 5, please confirm that notwithstanding that
9 Hydro is not seeking any interim increase to the Specifically Assigned
10 Charges ("SAC") as proposed in the GRA, Hydro continues to seek
11 implementation of changes to SAC for the 2015 Test Year, and that any
12 such changes approved are proposed by Hydro to be retroactive to
13 January 1, 2015 (if this is not accurate, please indicate the effective date
14 sought). If this is confirmed, please indicate whether Hydro is projecting
15 that any portion of the SAC impact is to be addressed by way of the IC
16 RSP Surplus funding or whether customers will instead be required to pay
17 a one-time retroactive amount (back to January 1, 2015), related to each
18 customers' changed SAC specifically, on conclusion of the GRA?

**All of which is respectfully submitted on behalf of the Island Industrial
Customers.**

DATED at the City of Corner Brook, in the Province of Newfoundland and Labrador, this 9th day of November, 2015.

POOLE ALTHOUSE / STEWART MCKELVEY

Solicitors for the Island Industrial Customers

Per:

Dean A. Porter

Per:

Paul L. Coxworthy

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

TO: Newfoundland & Labrador Hydro
P.O. Box 12400
500 Columbus Drive
St. John's, NL A1B 4K7
Attention: Geoffrey P. Young
Senior Legal Counsel

TO: Newfoundland Power Inc.
P.O. Box 8910
55 Kenmount Road
St. John's, NL A1B 3P6
Attention: Gerard Hayes,
Senior Legal Counsel

TO: Vale Newfoundland and Labrador Limited
c/o Cox & Palmer
Suite 1000, Scotia Centre
235 Water Street
St. John's, NL A1C 1B6
Attention: Thomas J. O'Reilly, Q.C.

TO: Corner Brook Pulp & Paper Limited
c/o Stewart McKelvey
Cabot Place, 100 New Gower Street
P.O. Box 5038
St. John's, NL A1C 5V3
Attention: Paul Coxworthy

TO: O'Dea Earle
323 Duckworth Street
P.O. Box 5955
St. John's, NL A1C 5X4
Attention: Mr. Thomas Johnson

TO: Olthuis, Leer, Townshend LLP
229 College Street
Suite 312
Toronto, ON M5T 1R4
Attention: Senwung Luk

TO: Genevieve M. Dawson
Benson Buffett
9th Floor, Atlantic Place
215 Water Street
P.O. Box 1538
St. John's, NL A1C 5N8