

# POOLE ALTHOUSE

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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.  
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22 **ISLAND INDUSTRIAL CUSTOMERS GROUP**  
23 **REQUESTS FOR INFORMATION**  
24 **IC-NLH-01 to IC-NLH-08**  
25 **Issued November 9, 2015**  
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- 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 9<sup>th</sup> 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  
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120 Torbay Road  
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TO: Newfoundland & Labrador Hydro  
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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  
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Attention: Paul Coxworthy

TO: O'Dea Earle  
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Attention: Mr. Thomas Johnson

TO: Olthuis, Leer, Townshend LLP  
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Attention: Senwung Luk

TO: Genevieve M. Dawson  
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