

1 Q. **Re: IN-NLH-055, IN-NLH-056 and IC-NLH-030**

2 Hydro declined to break down the amounts for Plant in Service in Exhibit 13,

3 Schedule 2.2E between Labrador East and Labrador West, stating:

4 “Board Order No. P.U. 14(2004) ruled that there will be a single cost of service  
5 study for the Labrador Interconnected System. As a result, Hydro does not track its  
6 detailed cost records on a basis that would provide information separately for  
7 Labrador East and Labrador West.”

8 However, Load Forecasts and Loss Rates (e.g., IC-NLH-030 page 2 and 6 of 10) do  
9 distinguish between these regions.

10 Please explain to what extent and at what level of detail Hydro is able to distinguish  
11 between investments in Lab East and Lab West, and present the plant additions on  
12 this basis.

13

14

15 A. While Hydro does not track all assets by location, Hydro is able to distinguish  
16 certain investments in Labrador East and Labrador West by the location code.  
17 Assets such as transformers, primary conductor, secondary conductor and pole  
18 hardware have not been allocated to a specific location within a system and are  
19 therefore classified as unallocated for the purpose of this response. Please see IN-  
20 NLH-186 Attachment 1 (Revision 1) which includes comparative data for 2007 and  
21 2015.

Labrador Interconnected Distribution Assets

Comparison of 2007 to 2015 (based on Schedule 2.2E Test year Cost of Service - average original cost)

Function	Unit of Property	2007 Labrador East	2007 Labrador West	2007 Unallocated	2007 Total	2015 Labrador East	2015 Labrador West	2015 Unallocated	2015 Total	Variance Labrador East	Variance Labrador West	Variance Unallocated	Variance Total
<b>CLASS - SUBSTATIONS</b>													
<i>310 - Distribution Substations</i>													
B01-Battery & Power Systems		0	48,965	0	48,965	0	48,965	0	48,965	0	0	0	0
B06-Buildings - Metal		0	0	0	0	0	0	0	0	(0)	0	0	(0)
B08-Buswork & Hardware		136,023	171,627	0	307,650	136,023	171,627	0	307,650	0	0	0	0
C04-Cables - Above Ground		101,646	199,806	0	301,452	101,646	51,621	0	153,267	0	(148,184)	0	(148,184)
C09-Circuit Breakers		204,765	72,669	0	277,434	204,765	72,669	0	277,434	0	0	0	0
C14-Conductor - Distribution		830	0	0	830	830	0	0	830	0	0	0	0
C15-Control, Meter / Relaying		54,905	124,196	0	179,100	54,905	124,196	0	179,100	0	0	0	0
D03-Disconnect Switches		65,551	362,841	0	428,392	107,680	354,428	0	462,107	42,128	(8,413)	0	33,715
F02-Fencing		46,607	99,625	0	146,232	46,607	99,625	0	146,232	0	0	0	0
F04-Footings & Foundations		9,936	137,451	0	147,387	9,936	137,451	0	147,387	0	0	0	0
G07-Ground Wire System		74,090	63,469	0	137,559	74,090	35,510	0	109,600	0	(27,959)	0	(27,959)
I02-Instrumentation		0	93,361	0	93,361	0	0	0	0	0	(93,361)	0	(93,361)
I03-Insulators		27,641	0	0	27,641	27,641	0	0	27,641	0	0	0	0
L02-Land Acquisitions		0	59,794	0	59,794	0	59,794	0	59,794	0	0	0	0
L03-Land Improvments		45,929	80,579	0	126,508	45,929	198,443	0	244,372	0	117,864	0	117,864
L04-Lighting Systems		0	18,608	0	18,608	0	18,608	0	18,608	0	0	0	0
L05-Lightning Arrestors		0	0	0	0	0	0	0	0	(0)	0	0	(0)
M03-MetalClad Switchgear cub/Equ 4kv/600v		0	555,750	0	555,750	0	0	0	0	0	(555,750)	0	(555,750)
M10-Misc Units of Prop		0	660,325	0	660,325	0	542,461	0	542,461	0	(117,864)	0	(117,864)
P04-Pole Cribbs & Pole Hardware		100,356	44,902	0	145,258	98,984	132,930	0	231,914	(1,372)	88,028	0	86,656
P07-Poles - Wood		8,214	18,007	0	26,221	8,214	38,732	0	46,946	0	20,725	0	20,725
P12-Protective Control & Relay Panels		0	0	0	0	0	93,361	0	93,361	0	93,361	0	93,361
R08-Reclosers		118,276	286,919	0	405,195	314,691	286,919	0	601,610	196,416	0	0	196,416
R09-Regulators		92	0	0	92	6,362	0	0	6,362	6,270	0	0	6,270
R13-Roads		0	7,809	0	7,809	0	7,809	0	7,809	0	0	0	0
S10-Station Service		0	42,122	0	42,122	0	42,123	0	42,123	0	0	0	0
S14-Street Lights		1,443	0	0	1,443	1,443	0	0	1,443	0	0	0	0
S15-Structural Supports (Wood or Steel)		0	228,246	0	228,246	0	232,814	0	232,814	0	4,568	0	4,568
S19-Station Switching		0	688,304	0	688,304	0	0	0	0	0	(688,304)	0	(688,304)
S20-Switching Systems - L.V.		0	25,477	0	25,477	0	0	0	0	0	(25,477)	0	(25,477)
T02-Test Equipment		0	0	0	0	0	52,351	0	52,351	0	52,351	0	52,351
T05-Transformers - Other		110,876	947,736	0	1,058,612	110,876	947,736	0	1,058,612	0	0	0	0
T06-Transformers - Pad Mount		37,095	4,507	0	41,603	107,334	4,507	0	111,842	70,239	0	0	70,239
T07-Transformers - Pole Mounted		12,881	0	0	12,881	12,881	0	0	12,881	0	(0)	0	(0)
<b>Total Distribution Substations</b>		<b>1,157,156</b>	<b>5,043,093</b>	<b>0</b>	<b>6,200,250</b>	<b>1,470,837</b>	<b>3,754,679</b>	<b>0</b>	<b>5,225,516</b>	<b>313,681</b>	<b>(1,288,415)</b>	<b>0</b>	<b>(974,734)</b>

## Labrador Interconnected Distribution Assets

## Comparison of 2007 to 2015 (based on Schedule 2.2E Test year Cost of Service - average original cost)

Function	Unit of Property	2007 Labrador East	2007 Labrador West	2007 Unallocated	2007 Total	2015 Labrador East	2015 Labrador West	2015 Unallocated	2015 Total	Variance Labrador East	Variance Labrador West	Variance Unallocated	Variance Total
<b>CLASS - DISTRIBUTION</b>													
<i>330 - Distribution Primary</i>													
	D03-Disconnect Switches	0	0	0	0	0	34,535	0	34,535	0	34,535	0	34,535
	R08-Reclosers	129,755	45,172	0	174,927	43,202	64,209	0	107,411	(86,553)	19,036	0	(67,516)
	<b>Total Distribution Primary</b>	<b>129,755</b>	<b>45,172</b>	<b>0</b>	<b>174,927</b>	<b>43,202</b>	<b>98,743</b>	<b>0</b>	<b>141,945</b>	<b>(86,553)</b>	<b>53,571</b>	<b>0</b>	<b>(32,982)</b>
<i>340 - Distribution Transformers</i>													
	T07-Transformers - Pole Mounted	0	0	0	0	0	40,945	0	40,945	0	40,945	0	40,945
	<b>Total Distribution Transformers</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>40,945</b>	<b>0</b>	<b>40,945</b>	<b>0</b>	<b>40,945</b>	<b>0</b>	<b>40,945</b>
<i>390 - Poles</i>													
	P04-Pole Cries & Pole Hardware	0	0	0	0	0	0	0	0	0	0	0	0
	P07-Poles - Wood	0	0	0	0	0	0	0	0	0	0	0	0
	S15-Structural Supports (Wood or Steel)	0	0	0	0	0	0	0	0	0	0	0	0
	<b>Total Poles</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>
<i>310 - Distribution Substations</i>													
	B05-Buildings other	0	0	0	0	7,456	0	0	7,456	7,456	0	0	7,456
	C14-Conductor - Distribution	0	0	0	0	0	46,185	0	46,185	0	46,185	0	46,185
	R09-Regulators	0	0	0	0	145,487	0	0	145,487	145,487	0	0	145,487
	S15-Structural Supports (Wood or Steel)	0	0	0	0	0	3,552	0	3,552	0	3,552	0	3,552
	S20-Switching Systems - L.V.	0	0	0	0	1,069	0	0	1,069	1,069	0	0	1,069
	T07-Transformers - Pole Mounted	0	0	0	0	0	64,024	0	64,024	0	64,024	0	64,024
	<b>Total Distribution Substations</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>154,012</b>	<b>113,762</b>	<b>0</b>	<b>267,774</b>	<b>154,012</b>	<b>113,762</b>	<b>0</b>	<b>267,774</b>
<i>320 - Distribution Submarine Cables</i>													
	C02-Cable - Submarine	475,797	0	0	475,797	580,078	0	0	580,078	104,281	0	0	104,281
	C03-Cables - Under Ground	40,030	0	0	40,030	40,030	0	0	40,030	0	0	0	0
	<b>Total Distribution Submarine Cables</b>	<b>515,827</b>	<b>0</b>	<b>0</b>	<b>515,827</b>	<b>620,108</b>	<b>0</b>	<b>0</b>	<b>620,108</b>	<b>104,281</b>	<b>0</b>	<b>0</b>	<b>104,281</b>
<i>330 - Distribution Primary</i>													
	C04-Cables - Above Ground	42,975	0	0	42,975	56,287	0	0	56,287	13,311	0	0	13,311
	C06-Capictors	0	0	0	0	0	9,531	0	9,531	0	9,531	0	9,531
	C13-Conductor - Transmission	269,514	0	0	269,514	269,514	0	0	269,514	0	0	0	0
	C14-Conductor - Distribution	1,404,077	738,417	6,205	2,148,700	1,740,674	1,689,339	0	3,430,013	336,597	950,922	(6,205)	1,281,313
	D03-Disconnect Switches	56,140	165,455	0	221,595	84,717	174,457	0	259,174	28,577	9,001	0	37,579
	F04-Footings & Foundations	13,199	0	0	13,199	12,735	0	0	12,735	(464)	0	0	(464)
	I03-Insulators	0	49,297	0	49,297	0	49,297	0	49,297	0	0	0	0
	P04-Pole Cries & Pole Hardware	12,033	45,263	0	57,296	0	62,808	0	62,808	(12,033)	17,545	0	5,512
	P05-Pole Structures - Wood	98,038	0	0	98,038	98,038	0	0	98,038	0	0	0	0
	R08-Reclosers	33,290	29,899	0	63,190	59,080	116,476	0	175,556	25,790	86,576	0	112,366
	R09-Regulators	25,762	0	0	25,762	87,740	76,975	0	164,715	61,979	76,975	0	138,954
	R12-Right - of - Ways	208,146	0	0	208,146	0	0	0	0	(208,146)	0	0	(208,146)
	S02-Sectionalizers	0	0	0	0	2,634	0	0	2,634	2,634	0	0	2,634
	S15-Structural Supports (Wood or Steel)	35,914	35,972	0	71,886	65,335	50,321	0	115,656	29,421	14,350	0	43,770
	S20-Switching Systems - L.V.	0	0	0	0	1,069	0	0	1,069	1,069	0	0	1,069
	T05-Transformers	0	9,531	0	9,531	0	0	0	0	0	(9,531)	0	(9,531)
	T07-Transformers - Pole Mounted	0	0	0	0	0	0	1,100,000	1,100,000	0	0	1,100,000	1,100,000

## Labrador Interconnected Distribution Assets

## Comparison of 2007 to 2015 (based on Schedule 2.2E Test year Cost of Service - average original cost)

Function	Unit of Property	2007 Labrador East	2007 Labrador West	2007 Unallocated	2007 Total	2015 Labrador East	2015 Labrador West	2015 Unallocated	2015 Total	Variance Labrador East	Variance Labrador West	Variance Unallocated	Variance Total
<b>CLASS - DISTRIBUTION (cont'd)</b>													
<b>Total Distribution Primary</b>													
<i>340 - Distribution Transformers</i>													
	M10-Misc Units of Prop	0	44,813	0	44,813	0	0	0	0	0	(44,813)	0	(44,813)
	P04-Pole Cribbs & Pole Hardware	0	0	0	0	8,083	0	0	8,083	8,083	0	0	8,083
	R09-Regulators	0	0	0	0	0	3,206,764	0	3,206,764	0	3,206,764	0	3,206,764
	S15-Structural Supports (Wood or Steel)	0	0	0	0	3,541	7,093	0	10,634	3,541	7,093	0	10,634
	T05-Transformers - Other	0	0	0	0	3,096	27,081	0	30,177	3,096	27,081	0	30,177
	T06-Transformers - Pad Mount	172,935	112,991	0	285,927	464,845	379,621	0	844,466	291,909	266,630	0	558,539
	T07-Transformers - Pole Mounted	2,469,892	1,892,666	0	4,362,559	3,861,698	8,310,153	0	12,171,851	1,391,806	6,417,486	0	7,809,292
<b>Total Distribution Transformers</b>		<b>2,642,828</b>	<b>2,050,471</b>	<b>0</b>	<b>4,693,298</b>	<b>4,341,263</b>	<b>11,930,712</b>	<b>0</b>	<b>16,271,975</b>	<b>1,698,435</b>	<b>9,880,242</b>	<b>0</b>	<b>11,578,677</b>
<i>350 - Distribution Secondary</i>													
	C04-Cables - Above Ground	0	0	0	0	20,798	0	0	20,798	20,798	0	0	20,798
	C14-Conductor - Distribution	408,858	435,810	5,495	850,163	503,468	433,166	0	936,634	94,611	(2,645)	(5,495)	86,471
	R09-Regulators	0	0	0	0	0	0	0	0	0	0	0	0
	T07-Transformers - Pole Mounted	0	0	0	0	0	0	875,000	875,000	0	0	875,000	875,000
<b>Total Distribution Secondary</b>		<b>408,858</b>	<b>435,810</b>	<b>5,495</b>	<b>850,163</b>	<b>524,266</b>	<b>433,166</b>	<b>875,000</b>	<b>1,832,432</b>	<b>115,408</b>	<b>(2,645)</b>	<b>869,505</b>	<b>982,269</b>
<i>370 - Distribution Services</i>													
	C04-Cables - Above Ground	0	0	0	0	6,261	0	0	6,261	6,261	0	0	6,261
	C14-Conductor - Distribution	891,644	760,640	11,682	1,663,966	1,175,197	642,697	0	1,817,894	283,553	(117,943)	(11,682)	153,927
	T07-Transformers - Pole Mounted	0	0	0	0	0	0	1,375,000	1,375,000	0	0	1,375,000	1,375,000
<b>Total Distribution Services</b>		<b>891,644</b>	<b>760,640</b>	<b>11,682</b>	<b>1,663,966</b>	<b>1,181,458</b>	<b>642,697</b>	<b>1,375,000</b>	<b>3,199,154</b>	<b>289,814</b>	<b>(117,943)</b>	<b>1,363,318</b>	<b>1,535,188</b>
<i>380 - Distribution Street Light</i>													
	S14-Street Lights	358,613	153,560	2,162	514,336	565,961	247,801	0	813,762	207,348	94,241	(2,162)	299,426
<b>Total Distribution Street Lights</b>		<b>358,613</b>	<b>153,560</b>	<b>2,162</b>	<b>514,336</b>	<b>565,961</b>	<b>247,801</b>	<b>0</b>	<b>813,762</b>	<b>207,348</b>	<b>94,241</b>	<b>(2,162)</b>	<b>299,426</b>
<i>390 - Poles</i>													
	D03-Disconnect Switches	0	0	0	0	0	24,983	0	24,983	0	24,983	0	24,983
	F02-Fencing	15,399	0	0	15,399	0	0	0	0	(15,399)	0	0	(15,399)
	G07-Ground Wire System	0	1,314	0	1,314	0	1,314	0	1,314	0	0	0	0
	L03-Land Improvements	56,296	0	0	56,296	0	0	0	0	(56,296)	0	0	(56,296)
	P04-Pole Cribbs & Pole Hardware	3,496,240	3,438,635	684,114	7,618,990	13,978,228	5,997,918	597,364	20,573,510	10,481,988	2,559,283	(86,750)	12,954,520
	P05-Pole Structures - Wood	57,202	0	0	57,202	57,202	0	0	57,202	0	0	0	0
	P06-Poles - Concrete	8,731	4,244	0	12,975	8,731	4,244	0	12,975	0	0	0	0
	P07-Poles - Wood	3,247,865	2,066,806	907,595	6,222,266	5,039,440	2,783,114	2,211,950	10,034,503	1,791,575	716,307	1,304,355	3,812,237
	R12-Right - of - Ways	33,323	148,474	36,246	218,043	0	34,710	1,025	35,735	(33,323)	(113,764)	(35,222)	(182,309)
	R13-Roads	4,148	0	0	4,148	0	0	0	0	(4,148)	0	0	(4,148)
	S14-Street Lights	0	3,889	0	3,889	0	0	0	0	0	(3,889)	0	(3,889)
	S15-Structural Supports (Wood or Steel)	0	0	0	0	0	9,823	0	9,823	0	9,823	0	9,823
	T04-Towers	0	0	0	0	0	23,416	0	23,416	0	23,416	0	23,416
	T07-Transformers - Pole Mounted	0	0	0	0	650,000	0	450,000	1,100,000	650,000	0	450,000	1,100,000
<b>Total Poles</b>		<b>6,919,205</b>	<b>5,663,363</b>	<b>1,627,955</b>	<b>14,210,523</b>	<b>19,733,601</b>	<b>8,879,522</b>	<b>3,260,338</b>	<b>31,873,462</b>	<b>12,814,396</b>	<b>3,216,159</b>	<b>1,632,383</b>	<b>17,662,939</b>

## Labrador Interconnected Distribution Assets

## Comparison of 2007 to 2015 (based on Schedule 2.2E Test year Cost of Service - average original cost)

Asset Function	Unit of Property	2007	2007	2007	2007	2015	2015	2015	2015	Variance	Variance	Variance	Variance
		Labrador East	Labrador West	Unallocated	Total	Labrador East	Labrador West	Unallocated	Total	Labrador East	Labrador West	Unallocated	Total
CLASS - DISTRIBUTION (cont'd)													
395 - Distn-Land/Land Improvements													
	F02-Fencing	0	0	0	0	10,287	0	0	10,287	10,287	0	0	10,287
	L03-Land Improvments	0	0	0	0	56,296	0	0	56,296	56,296	0	0	56,296
	R12-Right - of - Ways	0	0	0	0	416,995	190,860	72,049	679,904	416,995	190,860	72,049	679,904
	R13-Roads	0	0	0	0	4,148	0	0	4,148	4,148	0	0	4,148
	Total Distn- Land/Land Improvements	0	0	0	0	487,726	190,860	72,049	750,635	487,726	190,860	72,049	750,635
	Allocated meters	0	0	1,169,581	1,169,581	0	33,841	2,288,365	2,322,206	0	33,841	1,118,784	1,152,626
	Grand Total	15,222,972	15,225,946	2,823,081	33,271,998	31,600,254	28,595,932	11,259,118	69,166,939	16,377,282	13,369,986	6,147,672	35,894,941