



NEWFOUNDLAND AND LABRADOR
BOARD OF COMMISSIONERS OF PUBLIC UTILITIES
120 Torbay Road, P.O. Box 21040, St. John's, Newfoundland and Labrador, Canada, A1A 5B2

E-mail: ghayes@newfoundlandpower.com

2015-06-15

Mr. Gerard Hayes
55 Kenmount Road
P.O. Box 8910
St. John's, NL A1B 3P6

Dear Mr. Hayes:

Re: Newfoundland and Labrador Hydro - Amended General Rate Application - Requests for Information

Enclosed are Requests for Information PUB-NP-8 to PUB-NP-10 regarding the above-noted application.

If you have any questions, please do not hesitate to contact the Board's Legal Counsel, Ms. Jacqui Glynn, by email, jglynn@pub.nl.ca or by telephone 709-726-6781.

Yours truly,

Sara Kean
Assistant Board Secretary

/cpj
Encl.

cc. **Newfoundland & Labrador Hydro**
Mr. Geoff Young, E-mail: gyoung@nlh.nl.ca
Mr. Fred Cass, E-mail: fcass@airdberlis.com
NLH Regulatory, E-mail: NLHRegulatory@nlh.nl.ca
Newfoundland Power Inc.
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Island Industrial Customers Group

Mr. Paul Coxworthy, E-mail: pcoxworthy@stewartmckelvey.com
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Towns of Labrador City, Wabush, Happy Valley-Goose Bay and North West River

Mr. Dennis Browne, Q.C., Email: dbrowne@bfina-law.com
Mr. Edward Hearn, Q.C., E-mail: miller&hearn@crsty.net
Ms. Melanie Dawe, E-mail: mdawe@bfina-law.com

1 **IN THE MATTER OF** the *Electrical Power*
2 *Control Act, 1994*, SNL 1994, Chapter E-5.1 (the
3 "*EPCA*") and the *Public Utilities Act*, RSNL 1990,
4 Chapter P-47 (the "*Act*"), as amended, and regulations
5 thereunder; and

6
7 **IN THE MATTER OF** a general rate application
8 filed by Newfoundland and Labrador Hydro on
9 July 30, 2013; and

10
11 **IN THE MATTER OF** an amended general rate
12 application filed by Newfoundland and Labrador
13 Hydro on November 10, 2014.

**PUBLIC UTILITIES BOARD
REQUESTS FOR INFORMATION**

PUB-NP-8 to PUB-NP-10

Issued: June 15, 2015

- 1 **PUB-NP-8** In reference to footnote 24, page 14, of your prefiled evidence regarding the
 2 allocation of the rural deficit, you state that *“Notwithstanding Hydro’s*
 3 *proposed methodology appears based upon the cost borne per customer,*
 4 *Hydro does not propose to allocate the deficit on a per customer basis.”* Please
 5 explain in detail whether you would support an allocation of the rural deficit on
 6 the basis of number of customers, taking in to consideration that under the
 7 existing methodology the allocation of the rural deficit per customer is about
 8 three times higher for customers on the Labrador Interconnected System than
 9 for customers of NP.
- 10
 11 **PUB-NP-9** You conclude Section 3 (Rural Deficit) of your pre-filed evidence by stating at
 12 page 18, lines 8-9, that *“...it may be appropriate at this time for Hydro to*
 13 *consider rate design solutions to moderate the rate impact on the Labrador*
 14 *Interconnected customers.”* Please provide detailed examples of what rate
 15 design solutions may moderate the rate impact on Labrador Interconnected
 16 customers.
- 17
 18 **PUB-NP-10** In reference to Section 4.1 (Holyrood Capacity Factor) on page 18, lines 19-20,
 19 of your pre-filed evidence you state: *“Using Hydro’s forecast Holyrood*
 20 *capacity factor of 39% would reduce the 2015 Test Year costs allocated to*
 21 *Newfoundland Power by \$228,000.”* Other than reducing NP’s allocated cost,
 22 are there other reasons supporting your recommendation to use 39% for the
 23 Holyrood capacity factor instead of 28% used by Hydro in the 2015 cost of
 24 service study. Please explain your response in detail.

DATED at St. John’s, Newfoundland this 15th day of June 2015.

BOARD OF COMMISSIONERS OF PUBLIC UTILITIES

Per *Sara Kean*
 Sara Kean
 Assistant Board Secretary