

IN THE MATTER OF the Public
Utilities Act, R.S.N. 1990, Chapter P-47
(the Act), and

IN THE MATTER OF a General Rate Application
(the Application) by Newfoundland and Labrador Hydro
for approvals of, under Section 70 of the Act, changes
in the rates to be charged for the supply of power and
energy to Newfoundland Power, Rural Customers and
Industrial Customers; and under Section 71 of the Act,
changes in the Rules and Regulations applicable to the
supply of electricity to Rural Customers.

**Requests for Information by
Newfoundland Power Inc.**

To: Mr. Patrick Bowman and Mr. Hamid Najmidinov

NP-IC-001 to NP-IC-012

May 8, 2014

Requests for Information

NP-IC-001 [Pre-filed Testimony of Patrick Bowman and Hamid Najmidinov, InterGroup Consultants Ltd., April 28, 2014 (“InterGroup Consultants Testimony”), page 4, paragraph 1.6 and Section 5.5]

InterGroup Consultants argues that a portion of the Holyrood fuel should be classified as demand related, since it is increasingly used by Hydro due to transmission and reliability issues. Can InterGroup Consultants provide any examples from other regulatory jurisdictions where fuel is classified as a demand related cost and an explanation of why it is classified that way?

NP-IC-002 [InterGroup Consultants Testimony, page 4, paragraph 1.6 and Section 5.5]

InterGroup Consultants argues that a portion of the Holyrood fuel should be classified as demand related, since it is increasingly used by Hydro due to transmission and reliability issues. Please indicate at what times of the year Holyrood is used by Hydro due to transmission and reliability issues.

NP-IC-003 [InterGroup Consultants Testimony, page 5, paragraph 1.14]

Would InterGroup Consultants agree that all customers benefit when CDM programs reduce energy consumption on the Island Interconnected System, and thereby reduce Holyrood fuel consumption?

NP-IC-004 [InterGroup Consultants Testimony, page 7, lines 10-11]

In the response to Request for Information IC-NLH-079, the following alternate rate design for Newfoundland Power is provided:

Rate Component	Current Rate	IC-NLH-079 Rate	% Change
Demand	\$4.00/kW/mo	\$4.00/kW/mo	0%
1 st Block	32.46 (Mills/kwh)	27.86 (Mills/kwh)	(14%)
2 nd Block	88.05 (Mills/kwh)	136.81 (Mills/kwh)	55%

InterGroup Consultants identifies one of the Industrial Customers’ concerns as being “long term stability and predictability in electricity rates.”

Is it InterGroup Consultants' opinion that the alternate rate design provided in the response to Request for Information IC-NLH-079 is consistent with long term stability and predictability in electricity rates?

NP-IC-005 [InterGroup Consultants Testimony, page 12, lines 25-26]

If the Industrial Customers are to be brought to full cost of service in the 3 year transition period required by OC2013-089, what percentage increases per year would InterGroup Consultants suggest as an alternative to Hydro's proposal in the Application?

NP-IC-006 [InterGroup Consultants Testimony, page 28, line 21 to page 30, line 2]

The title of the referenced section of testimony is "Normalize Entire Cost of Service Study". However, the section is focused on normalizing the peak loads and load factors for Vale and Praxair.

Does InterGroup Consultants agree that a cost of service study that normalizes *all* inputs is necessary to ensure not only "fair and reasonable estimation of the cost responsibility between customer classes", but also that rates of all customers are reasonable and not unjustly discriminatory?

NP-IC-007 [InterGroup Consultants Testimony, Section 7.3]

Has the 18 MW contractual limit imposed on the frequency converter resulted in spillage at Corner Brook Pulp and Paper's Deer Lake hydroelectric facility? Please provide details regarding the resulting reduction in energy production.

NP-IC-008 [InterGroup Consultants Testimony, page 50, lines 3-7]

Please provide a breakdown of the amount of support provided to the system by Corner Brook Pulp and Paper during the 2013-2014 winter season. The breakdown should include the capacity made available through (i) increasing the maximum operating parameters of the frequency converter, (ii) increasing generation and (iii) reducing load.

NP-IC-009 [InterGroup Consultants Testimony, Section 7.3]

Further to NP-IC-009 above, provide a breakdown of the compensation Corner Brook Pulp and Paper received from Hydro for providing support to the system during the 2013-2014 winter season.

- NP-IC-010 [InterGroup Consultants Testimony, Section 7.3, Table 7-1]
Please provide in the format of Table 7-1, the allocation of the 2013 Load Forecast and Hydraulic Generation Allocation in terms of energy (MWh).
- NP-IC-011 [InterGroup Consultants Testimony, page 52, lines 16 to 18]
What impact would increasing the maximum operating parameter of the frequency converter from 18 MW to 22.5 MW have on Corner Brook Pulp and Paper's Power on Order?
- NP-IC-012 Would InterGroup Consultants support the recommendation by the Consumer Advocate's witness, C. Douglas Bowman, that 3 years between GRAs should be the target in this province?

RESPECTFULLY SUBMITTED at St. John's, Newfoundland and Labrador, this 8th day of May, 2014.



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