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September 23, 2013

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**Via Electronic Mail and 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's 2013 General Rate Application**

Please find enclosed the original and twelve (12) copies of the Requests for Information IC-NLH-1 to IC-NLH-96 of the Island Industrial Customers in the above Application.

We trust you will find the enclosed to be in order.

Yours truly,

Stewart McKelvey

Paul L. Coxworthy

PLC/kmcd

Enclosure

- c. Geoffrey P. Young, Senior Legal Counsel, Newfoundland and Labrador Hydro
- Thomas J. Johnson, Consumer Advocate
- Gerard Hayes, Newfoundland Power
- Dean A. Porter, Poole Althouse
- Thomas O'Reilly, Q.C., Vale Newfoundland and Labrador Limited
- Edward M. Hearn QC, Miller & Hearn
- Nancy Kleer, Olthuis, Kleer, Townshend LLP
- Yvonne Jones, MP, Labrador

**IN THE MATTER OF** the *Public Utilities Act*,  
(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.

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**ISLAND INDUSTRIAL CUSTOMERS  
REQUESTS FOR INFORMATION  
IC-NLH-1 TO IC-NLH-96**

**Issued: September 23, 2013**

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IN THE MATTER OF the *Public Utilities Act*, (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.

1 REQUESTS FOR INFORMATION OF THE ISLAND INDUSTRIAL CUSTOMERS

- 2 **IC-NLH-1**                     **Reference: Page 1.19 Lines 15-17.** Please provide a copy of the ROE  
3 direction referenced at page 1.19 lines 15-17.
- 4 **IC-NLH-2**                     Provide a copy of the final COS for the 2006 GRA, reflecting the  
5 approved revenue requirement. Please also provide COS studies from  
6 intervening years, if available – both actual and forecast.
- 7 **IC-NLH-3**                     **Reference: Page 1.22.** Please provide a copy of the Deloitte review  
8 regarding cost recovery referenced at page 1.22.
- 9 **IC-NLH-4**                     **Reference: Page 1.22.** Indicate any correspondence or approvals  
10 provided by the Board in respect of the Deloitte review on cost recovery.
- 11 **IC-NLH-5**                     **Reference: Page 2.18.** Please provide details on the vacancy rate  
12 assumed in the current GRA, including what the rate is equivalent to in  
13 terms of Salaries and Benefits, and in terms of FTE positions unfilled.
- 14 **IC-NLH-6**                     Please include the actual vacancy rate for each year since the previous  
15 GRA, calculated on the same basis as in IC-NLH-5.
- 16 **IC-NLH-7**                     **Reference: Section 2.2.3.** Please indicate if the costs deferred for CDM  
17 activities include any capital assets.
- 18 **IC-NLH-8**                     **Reference: Section 2.2.3.** Please provide an annual accounting for all  
19 expenditures and amortization of CDM expenses to date.
- 20 **IC-NLH-9**                     **Reference: Section 2.2.3.** Please provide a detailed description of the 7  
21 year amortization of CDM expenses – is it discrete for each year's  
22 spending, or a rolling 7 years (1/7 of total balance each year)?

23

- 1     **IC-NLH-10**           **Reference: Section 2.2.3.** Are all CDM expenditures amortized over 7  
2                            years, or only program expenditures? (e.g., is general CDM  
3                            administration amortized over 7 years, even where such expense is not  
4                            linked to a specific program initiative?)
- 5     **IC-NLH-11**           Regarding IFRS and capital expenditures – please provide a list of all  
6                            changes implemented as a result of P.U.2-2012 and indicate the status of  
7                            implementation of these changes.
- 8     **IC-NLH-12**           **Reference: Section 2.5.1 Island Interconnected Load Forecast.**  
9                            Regarding sales to NP, please provide the actual, weather adjusted, and  
10                          forecast levels of (i) capacity (native peak), (ii) capacity (COS, net of  
11                          generation credit), (iii) energy (GW.h) for each year since 2005.
- 12    **IC-NLH-13**           **Reference: Page 2.15.** Please provide the accounting policy for critical  
13                          spares. In particular, are these items capitalized, held in inventory,  
14                          depreciated, included in asset accounts for the purpose of depreciation  
15                          studies, etc?
- 16    **IC-NLH-14**           **Reference: Page 2.24.** Please provide a list of all Operating Expense  
17                          Costs that arise due to amortization of O&M activities over future periods  
18                          (such as for the System Equipment Maintenance (SEM) amortization of  
19                          expenses, including the Asbestos Removal program) along with the  
20                          amortization schedule. Please provide a list of all such amortized projects  
21                          proposed for the 2013 test year.
- 22    **IC-NLH-15**           **Reference: Page 2.25 line 6.** Please provide the total CDM costs  
23                          forecast for 2013 for all categories of O&M costs, and where in the O&M  
24                          schedules these costs reside.
- 25    **IC-NLH-16**           **Reference: Page 2.21 footnote.** Please provide Hydro’s latest  
26                          Generation Planning report, as referenced in the footnote on page 2.41.
- 27    **IC-NLH-17**           **Reference: Page 2.46 and Exhibit 13 page 1.** Please reconcile the 2013  
28                          power purchase estimates of \$51.8 million (page 2.46) with the estimate  
29                          \$52.4 million (column 3 row 6 of Exhibit 13).
- 30    **IC-NLH-18**           **Reference: Page 2.46.** Please provide the 10 year regression analysis  
31                          referenced at page 2.46.
- 32    **IC-NLH-19**           **Reference: Exhibit 5.** Please provide a description of the procurement  
33                          process Hydro followed to select Hatch to provide the latest generation of  
34                          models for “determining the average hydroelectric capabilities of its  
35                          system” (page 2.50). Please indicate the date of any RFP, the number of  
36                          bidders and the expected value of the contract awarded for supply,  
37                          implementation, maintenance and consulting services related to the DSS.  
38                          If Hatch was not the lowest cost bidder, please indicate the approximate  
39                          pricing spread between Hatch and the lowest cost bidder and indicate the  
40                          rationale for not selecting the DSS based on best value practices.

- 1 **IC-NLH-20** **Reference: Exhibit 5.** Please provide a summary of all annual amounts  
2 paid to Hatch for hydrological modeling services, including software  
3 purchases and implementation, and consulting service, since the 2006  
4 GRA.
- 5 **IC-NLH-21** **Reference: Section 2.2.2: Exploits Generation and page 2.52.** Please  
6 explain, based on section 2.2.2, the precise ownership and allocation of  
7 the power assets and output from each of Star Lake, Exploits River Hydro  
8 Partnership, Grand Falls, Buchans, and Bishop's Falls stations in the  
9 GRA, and the situation in the previous GRA. Please also provide the  
10 rationale for the statement that Hydro "does not own" Exploits assets at  
11 page 2.52.
- 12 **IC-NLH-22** **Reference: Pages 2.3-2.4.** Please explain how the long-term average  
13 hydraulic generation record was adjusted for the hydro spillage noted at  
14 pages 2.3-2.4.
- 15 **IC-NLH-23** **Reference: Page 2.3–2.4.** Re: IC-NLH-22, please also note how the RSP  
16 was adjusted, if at all, for this same factor.
- 17 **IC-NLH-24** **Reference: Section 2 - Schedule I: Operating Expenses by**  
18 **Functional Area.** Please provide a version of the table that shows year-  
19 over-year percentage changes. Focusing on year over year changes,  
20 please provide a detailed narrative description of the changes for all  
21 categories experiencing more than a 5% change from 2012 actuals to  
22 2013 forecast.
- 23 **IC-NLH-25** **Reference: Page 2.26.** - What are the "external fees" related to GRA  
24 costs? Please provide a schedule of GRA costs from 2006 to 2013, by  
25 year, indicating the type of cost incurred.
- 26 **IC-NLH-26** **Reference: Section 2: Regulated Activities – Section II: Actual and**  
27 **Forecast Electricity Requirements.** Since 2007 test year, Regulated  
28 Activities Schedule 2 indicated Hydro expects that the NP peak load has  
29 grown by 5% while the energy has grown by 13%, which changes the NP  
30 load factor from 50.1% to 54.1%. Please provide all reasons for such a  
31 significant forecast growth in load factor?
- 32 **IC-NLH-27** **Reference: Section 2: Regulated Activities – Section II: Actual and**  
33 **Forecast Electricity Requirements.** To what extent are CDM, demand  
34 response programs, or other demand initiatives expected to be driving an  
35 increase in the NP load factor? Are these programs an initiative of Hydro  
36 or of NP?
- 37 **IC-NLH-28** Please update IC-NLH-41 from the 2006 GRA.
- 38 **IC-NLH-29** Please update IC-NLH-30 from the 2006 GRA.
- 39 **IC-NLH-30** Please update IC-NLH-153 from the 2006 GRA.
- 40 **IC-NLH-31** Please update PUB-NLH-3 from the 2006 GRA.

- 1 **IC-NLH-32** **Reference: Section 2.2.2 Exploits Generation.** Please explain the full  
2 rationale for owning the Grand Falls, Buchans and Star Lake plants in  
3 Nalcor rather than as assets in Hydro rate base.
- 4 **IC-NLH-33** **Reference: Section 2: Regulated Activities – Section VI: Energy**  
5 **Purchases BY Supplier – Note 4.** Please provide all evidence in support  
6 of the \$0.04 cents/kW.h purchase price for generation from Grand Falls,  
7 Buchans and Star Lake, how this price was set, and how it compares to  
8 the costs of owning and operating these plants.
- 9 **IC-NLH-34** **Reference: Section 3: Finance, Schedule II and III.** Please explain the  
10 2013 operating cost difference between Schedule 2 (111,046) and  
11 Schedule 3 (113,820).
- 12 **IC-NLH-35** **Reference: Section 3.2.3.1 Debt Guarantee Fee Initiative.** Please  
13 provide a summary of the debt guarantee fees (rate and total dollar value)  
14 that have been charged to Hydro since the 2006 GRA, by year, and  
15 forecast for 2013.
- 16 **IC-NLH-36** **Reference: Section 3.2.3.1 Debt Guarantee Fee Initiative.** Please  
17 provide a copy of any documentation from Government explaining the  
18 rationale from the Government for the change in the debt guarantee fee.
- 19 **IC-NLH-37** **Reference: Section 3.2.3.1 Debt Guarantee Fee Initiative.** Please  
20 provide a copy of the 2010 debt guarantee fee analysis.
- 21 **IC-NLH-38** **Reference: Page 3.26.** Please provide a description of Hydro's  
22 requirement to maintain sinking funds.
- 23 **IC-NLH-39** **Reference: Section 3: Finance, Schedule I: Balance Sheet.** Please  
24 provide Hydro's sinking fund investment policy, and indicate the  
25 performance of the sinking funds in net financial performance since the  
26 2006 GRA.
- 27 **IC-NLH-40** Has Hydro investigated the options of borrowing (on its own with the debt  
28 guarantee, or through a pass through of government borrowing) without a  
29 sinking fund requirement? If so, please provide the options investigated  
30 and the cost and benefit implications of such an approach.
- 31 **IC-NLH-41** Has Hydro done any comparison to similarly situated Crown utilities in  
32 respect of sinking funds. For example, is Hydro aware that BC Hydro no  
33 longer has a requirement to maintain sinking funds?
- 34 **IC-NLH-42** **Reference: Page 3.7 footnote 5 and page 3.9.** If the updated policy for  
35 dividends was adopted in 2009, please indicate the dividends paid in  
36 each of 2009-2013 (forecast). With reference to Table 3.2, please provide  
37 the calculation of the level of dividends.
- 38 **IC-NLH-43** **Reference: Exhibit 13.** For the Island Interconnected System, please  
39 provide a summary of any changes to the classification, assignments or  
40 allocations used in the 2013 cost-of-service study (relative to the COSS

- 1 from the 2006 GRA). Please describe the reason for the change as well  
2 as the impact on each customer class.
- 3 **IC-NLH-44** **Reference: Page 3.26.** Please provide details on the \$7.9 million in  
4 "interest earned on the sinking funds compared to the 2006 GRA".  
5 Indicate the interest forecast to be earned in the 2006 GRA, and in each  
6 case indicate the content of the sinking funds and the earnings rate.
- 7 **IC-NLH-45** **Reference: Page 3.28.** Will Hydro use IFRS for the financial statements  
8 for the period ending December 31, 2013? If the answer is it remains  
9 unknown, when will the final decision be made?
- 10 **IC-NLH-46** **Reference: Section 3: Finance, Schedule I page 2.** Please indicate the  
11 location of the "RSP Surplus" and the assumptions as to the date of  
12 payment of the NP portion of the RSP surplus.
- 13 **IC-NLH-47** **Reference: Exhibit 13.** Please indicate the assumed 2013 interest cost  
14 for the RSP included in the COS, and where this interest cost is shown,  
15 and where it is allocated.
- 16 **IC-NLH-48** **Reference: Section 4.7.2: Proposed Deferral and Recovery**  
17 **Mechanisms.** Why is CDM not recovered as a normal component of the  
18 utility revenue requirement?
- 19 **IC-NLH-49** **Reference: Section 4.7.2: Proposed Deferral and Recovery**  
20 **Mechanisms.** Please indicate if Hydro reviewed how CDM (or equivalent)  
21 costs are recovered by other peer utilities including, for example,  
22 Manitoba Hydro and BC Hydro. If so, please confirm that these other  
23 utilities include their CDM (or DSM) costs in their respective revenue  
24 requirements.
- 25 **IC-NLH-50** **Reference: Rate Schedules Page 20 and 21 of 47; Conservatio and**  
26 **Demand Management Recovery.** Please provide all rationales for  
27 allocating the CDM expenses to customers on an energy usage basis,  
28 rather than as an allocation to the customer class who benefitted from the  
29 CDM.
- 30 **IC-NLH-51** **Reference: Page 2.43.** With regard to the NP Generation Credit, as  
31 referenced at page 2.43, please update IC-37, IC-38 and IC-43 from the  
32 2006 GRA.
- 33 **IC-NLH-52** **Reference: Section 4.7.2: Proposed Deferral and Recovery**  
34 **Mechanisms.** Please confirm Hydro is not seeking approval of any power  
35 purchase cost variance deferral for the Island Interconnected System.  
36 Please provide the rationale (i.e., if not, why not?).
- 37 **IC-NLH-53** **Reference: Section 3.8.4: Deferred Charges.** Please confirm the  
38 amortization of GRA costs are included in the revenue requirement, on  
39 the basis of Hydro's current request (i.e., to amortize these costs over a 3  
40 year period, starting in 2013).

- 1 **IC-NLH-54** **Reference: Section 3: Finance, Schedule I page 2.** Please indicate the  
2 sources of cash that will be used to finance the refund of the NP RSP  
3 surplus, and the impact this will have on Hydro's overall net borrowing  
4 levels, debt guarantee fee to be paid, and cost of service once the  
5 payment is made.
- 6 **IC-NLH-55** **Reference: Pages 3.27 to 3.28.** Is the current GRA prepared on the  
7 same basis of accounting as set out in P.U. 13 (2012)?
- 8 **IC-NLH-56** **Reference: Exhibit 4 page 1.** Please provide all analysis in support of  
9 the claim of equivalency between the "credit" provided NP in respect of its  
10 generation and the credit provided to CBPP. Please ensure the response  
11 includes a full COS analysis showing no credit to NP for its generation.  
12 Please also quantify all benefits to CBPP from the Generation Credit  
13 agreement.
- 14 **IC-NLH-57** **Reference: Exhibit 13.** Please provide an estimate of the total value of  
15 savings generated on Hydro's system as a result of NP's generation  
16 credit (as compared to a situation with NP's generation receiving no NP  
17 COS generation credit).
- 18 **IC-NLH-58** **Reference: Exhibit 4 page 3 lines 4-8.** Please provide all calculations in  
19 support of the CBPP Generation Credit COS benefit and the allocation to  
20 specific customer classes.
- 21 **IC-NLH-59** **Reference: Exhibit 4 page 12 – section 3.3.3.** Please confirm the  
22 \$0.248 million lower revenues (based on implementation of the CBPP  
23 revised contract) is solely based on the loss of Hydro's ability to collect  
24 the 10% "administration fee".
- 25 **IC-NLH-60** **Reference: Exhibit 4 page 12 – section 3.3.3.** Please confirm that the  
26 non-firm "administration fee" is solely implemented as a cost recovery  
27 charge (and not an added form of new net revenue to Hydro).
- 28 **IC-NLH-61** **Reference: Exhibit 4 page 12- section 3.3.3.** Please indicate the 2013  
29 test year forecast non-firm sales and the total "administration fees"  
30 forecast to be collected.
- 31 **IC-NLH-62** **Reference: Section 3: Finance, Table 3.1, page 3.5 and Table 3.2 on**  
32 **Page 3.9.** From Table 3.1 and 3.2, why does guaranteed debt  
33 outstanding and total regulated debt drop significantly 2007 and 2013?
- 34 **IC-NLH-63** AROs - provide status of implementing the ARO reporting pursuant to  
35 P.U. 29 (2012). Provide the calculation of all AROs and the proposed  
36 regulatory treatment of the ARO amounts.
- 37 **IC-NLH-64** Fuel savings from capital projects – since 2006 list all projects with an  
38 estimated fuel savings from the capital budget process, and provide all  
39 implementation and verification details available to confirm these savings  
40 were in fact achieved.



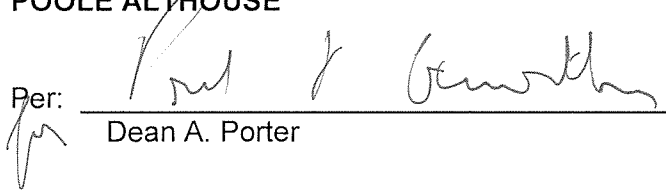
- 1    **IC-NLH-65**                    **Reference: Section 2.2.2.** Please provide the value of all compensation  
2    or other costs incurred/paid by the Government or NALCOR in acquiring,  
3    transferring and integrating the various Exploits assets into the Hydro  
4    system.
- 5    **IC-NLH-66**                    **Reference: Section 2.2.2.** Please provide all annual generation output  
6    values for each of Star Lake, Exploits River Hydro Partnership, Grand  
7    Falls, Buchans, and Bishop's Falls stations the since the date of transfer
- 8    **IC-NLH-67**                    **Reference: Page 2.4.** Please provide a copy of the direction regarding 4  
9    cent power at described at page 2.4. What happens after June 30, 2014?
- 10   **IC-NLH-68**                    **Reference: Exhibit 5.** Please provide the key studies in support of the  
11    revised long-term average hydro values on the Island Interconnected  
12    System
- 13   **IC-NLH-69**                    **Reference: Exhibit 5.** Please indicate the date of all adjustments to the  
14    RSP "long term average hydro generation" values to reflect the revised  
15    fleet of generating units, and indicate how these have affected the RSP  
16    since they were implemented.
- 17   **IC-NLH-70**                    Please indicate, as part of the CDM program if any consideration was  
18    given to reinstating capacity shedding options for large customers, such  
19    as the previous Interruptible B. If not, why not?
- 20   **IC-NLH-71**                    **Reference: Page 2.5 Table 2.2.** Please provide an explanation of all  
21    2012 industrial CDM, indicating the rationale for the large increase for  
22    2012, as per Table 2.2 page 2.5.
- 23   **IC-NLH-72**                    **Reference: Exhibit 9.** With respect to NP's curtailable load program,  
24    please file all details on the program including the rate schedule, the  
25    compensation paid to customers, the justification that NP or Hydro can  
26    use to initiate an interruption, and the number of interruptions, by month  
27    (showing the number of interruptions, the capacity and energy  
28    interrupted, and the number of customers affected) since the 2008.
- 29   **IC-NLH-73**                    **Reference: Exhibit 9 page 9.** Please provide Hydro's estimate of the  
30    marginal cost of capacity.
- 31   **IC-NLH-74**                    **Reference: Exhibit 9 page 10.** Please provide Hydro's July 2010  
32    Generation Planning Issues Report as referenced at page 10 of Exhibit 9.
- 33   **IC-NLH-75**                    **Reference: Exhibit 9 page 1.** Please provide the data behind Figure 1 of  
34    Exhibit 9.
- 35   **IC-NLH-76**                    **Reference: Exhibit 9.** Please indicate why Lummus considers "keeping  
36    the demand rate equal to cost" to be an overriding rate design constraint  
37    for NP, particularly given this was not the principle adopted out of the  
38    2006 GRA.

- 1 **IC-NLH-77** **Reference: Exhibit 9 page 15.** Re: Exhibit 9 page 15. Please provide all  
2 information used to come to conclusions in respect of “the possible  
3 demand/energy relationship of the next least-cost supply resource.”
- 4 **IC-NLH-78** **Reference: Exhibit 9.** Please confirm that the problems associated with  
5 NP’s inappropriate use of curtailable load (i.e., to reduce their peak  
6 demand billing, but applied in the absence of any real system emergency  
7 or need for the capacity) will be exacerbated by the increase in NP  
8 demand charge to the \$9.12/kW level from the current \$4/kW level.
- 9 **IC-NLH-79** **Reference: Exhibit 9.** Please provide the NP rate design in the event the  
10 demand charge was maintained at the \$4/kW level, no generation credit  
11 was provided for curtailable load, the first block rate was retained at the  
12 \$0.02786 level as proposed, and the Second block rate was set to collect  
13 the residual revenue requirement.
- 14 **IC-NLH-80** **Reference: Exhibit 9 page 17.** Please provide the economic tests  
15 applied in determining whether to proceed with an industrial CDM  
16 opportunity. In particular, does Hydro apply the Total or Marginal  
17 Resource Cost test, the Rate Impact Measure test, or other economic  
18 tests?
- 19 **IC-NLH-81** **Reference: Exhibit 9 section 4.1.1.** Following the first set of two bullets  
20 there appears to be an incomplete sentence. Please advise on any  
21 necessary edits to this section.
- 22 **IC-NLH-82** **Reference: Exhibit 9 page 19.** Please indicate if Hydro and NP share  
23 the costs of the CDM program in respect of each other’s customers, or  
24 does Hydro’s component of costs (revenue requirement and deferral) only  
25 affect the Hydro directly served customers (e.g., Rural and IC).
- 26 **IC-NLH-83** **Reference: Exhibit 9 page 19.** Please confirm that none of Hydro’s  
27 current or planned CDM programs provide capacity-related load  
28 reductions, or any energy savings at the time of system peak.
- 29 **IC-NLH-84** **Reference: Exhibit 9 page 21.** Please indicate whether an option of  
30 deferring all CDM program costs incurred in each given year were  
31 amortized over a stated period (e.g., 5 or 7 years) and this amortization  
32 were included in Hydro’s rate base and revenue requirement would give  
33 rise to the rate and stability issues noted at exhibit 9 page 21.
- 34 **IC-NLH-85** Please update IC-5-NLH from the 2006 GRA.
- 35 **IC-NLH-86** Please update IC-29-NLH from the 2006 GRA.
- 36 **IC-NLH-87** **Reference: Page 4.6 Table 4.2.** With respect to specifically assigned  
37 charges, please provide an update to IC-33, IC-34 and IC-35 from the  
38 2006 GRA.
- 39 **IC-NLH-88** **Reference: Page 4.6 Table 4.2.** With respect to specifically assigned  
40 charges, please provide a complete listing of all asset/asset grouping


- 1 included in the category of specifically assigned assets for each of the IC  
2 and for NP, and indicate the rationale, role and justification for the assets  
3 being included as a specifically assigned asset.
- 4 **IC-NLH-89** Please update IC-NLH-36 from the 2006 GRA.
- 5 **IC-NLH-90** Please update NP-NLH-27 from the 2006 GRA.
- 6 **IC-NLH-91** Please update IC-NLH-49 from the 2006 GRA.
- 7 **IC-NLH-92** **Reference: Exhibit 9 page 10.** Why has Lummus considered that NP's  
8 demand rate should be raised to be "cost-based" on average costs, when  
9 Hydro's previous rate consultant (NERA) concluded in their report (as part  
10 of the 2006 GRA – July 2006) that under Hydro's then demand cost  
11 structure (which had lower demand rates) it was likely that "NP may well  
12 be over-investing in demand-reducing measures" leading to reduced  
13 billings to NP with no corresponding reduction in Hydro's system costs.
- 14 **IC-NLH-93** **Reference: Page 2.46.** Re: Holyrood efficiency per page 2.46. Provide  
15 data in graphical and tabular form showing actual operating efficiencies of  
16 each unit at Holyrood for the last 5 years, as well as all activities  
17 undertaken in the last 5 years to improve the efficiency of generation at  
18 Holyrood.
- 19 **IC-NLH-94** Please update CA-135 from the 2006 GRA.
- 20 **IC-NLH-95** **Reference: Charts 3.3 to 3.5.** Please provide a definition of FTE as used  
21 and indicate how the values were calculated, particularly with respect to  
22 the number of positions, vacancies, long term leave, and unbudgeted  
23 positions filled during the fiscal year.
- 24 **IC-NLH-96** **Reference: Pages 2.18.** Please provide the FTE per department and  
25 functional area and total for each actual year 2007 – 2012 and 2007  
26 forecast and 2013 forecast years.

**DATED** at St. John's, in the Province of Newfoundland and Labrador, this 23<sup>rd</sup> day of September, 2013.

**POOLE ALTHOUSE**

Per:   
Dean A. Porter

**STEWART MCKELVEY**

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  
Attention: Board Secretary

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: Thomas Johnson, Consumer Advocate  
O'Dea, Earle Law Offices  
323 Duckworth Street  
St. John's, NL A1C 5X4

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

TO: Cox & Palmer  
Scotia Centre, Suite 1000  
235 Water Street  
St. John's, NL A1C 1B6  
Attention: Mr. Thomas J. O'Reilly Q.C.