



January 15, 2014

Ms. G. Cheryl Blundon
Board of Commissioners of Public Utilities
120 Torbay Road, P.O. Box 12040
St. John's, NL A1A 5B2

Ladies & Gentlemen:

Re: Newfoundland and Labrador Hydro – Application for approval of a capital project for the installation of diesel units at Holyrood for the purposes of blackstarting the generating units, and for the deferral of lease costs.

Please find enclosed the original and eight (8) copies of the Requests for Information numbered CA-NLH-01 to CA-NLH-19.

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

Yours very truly,

O'DEA, EARLE

A handwritten signature in black ink, appearing to read 'Thomas Johnson', is written over the printed name.

THOMAS JOHNSON
TJ/cel
Encl.

cc: Newfoundland and Labrador Hydro
Attention: Geoffrey P. Young

Newfoundland Power
Attention: Gerard Hayes,

Island Industrial Customers Group
Attention: Mr. Paul Coxworthy (Stewart McKelvey)

Vale Newfoundland and Labrador Limited
Attention: Mr. Thomas O'Reilly, Q.C. (Cox & Palmer)

IN THE MATTER OF

the *Electrical Power Control Act*, R.S.N.L. 1994,
Chapter E-5.1 (the "*EPCA*") and the *Public Utilities Act*, R.S.N.L. 1990,
Chapter P-47 (the "*Act*"), and regulations thereunder;

AND

IN THE MATTER OF

an Application by Newfoundland and Labrador Hydro
for the approval, pursuant to Subsection 41(3) of the *Act*,
of infrastructure required for the installation of diesel units
at Holyrood for the purpose of blackstarting the generating
units, and pursuant to Sections 49, 78 and 80 of the *Act*,
for the deferral of lease costs relating to the diesel units
required for blackstart purposes.

**CONSUMER ADVOCATE
REQUESTS FOR INFORMATION
CA-NLH-1 to CA-NLH-19**

Issued: January 15, 2014

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28
29
30
31

CA-NLH-1

(Re: November 2013 Report to Board on Holyrood Black Start Analysis, Summary) Hydro states “By modeling a black start event, Hydro was able to predict the ability of a particular generation solution to start the thermal plant and in particular the large boiler feed pump motors”. Did Hydro undertake this modeling exercise prior to moving and connecting the Newfoundland Power mobile generation at Holyrood? If so, what did the modeling results show, and if not, why not?

CA-NLH-2

(Re: Application Clause 7) How much time and cost was involved in the process of moving and connecting the Newfoundland Power mobile generation at Holyrood?

CA-NLH-3

(Re: Application Clause 7) How much time and cost was involved in the black start contingency plan involving the Hardwoods gas turbine?

CA-NLH-4

(Re: Application Clause 2) Hydro indicates that “The gas turbine was very rarely required to perform the black start function”. In its history, how many times was the gas turbine needed and successfully used for black start, and how many times has the black start function at Holyrood been needed since the gas turbine was taken out of service?

CA-NLH-5

(Re: Application Clause 6) Please provide the current timeline for approval, construction and commissioning of the new 60 MW combustion turbine.

CA-NLH-6

(Re: Application Clause 8) Hydro indicates that the installation date for the diesel plant black start project “depends upon receipt

1 of Board approval for this project". Please provide the current
2 timeline for the project starting with the Board approval and
3 ending with full functionality of the diesel plant as a black start
4 facility.

5
6 CA-NLH-7 (Re: Application Clause 9) Please provide the current cost estimate
7 for the diesel plant black start project including total capital, and
8 annual and total lease costs.

9
10 CA-NLH-8 (Re: Application Clause 10) What is the impact in percentage and
11 dollar terms that lease costs would have if expensed in the year
12 incurred on: 1) rates, if the Board were to allow Hydro full cost
13 recovery, and 2) on Hydro's return if the Board were not to allow
14 full cost recovery?

15
16 CA-NLH-9 What is the impact in percentage and dollar terms that capital costs
17 would have on: 1) rates, if the Board were to allow Hydro full cost
18 recovery, and 2) on Hydro's return if the Board were not to allow
19 full cost recovery?

20
21 CA-NLH-10 (Re: November 2013 Report to Board on Holyrood Black Start
22 Analysis, Summary) Hydro states that it has worked with generator
23 suppliers to source units that could be delivered to the Holyrood
24 site on very short notice to meet the needs of the 2013 – 2014
25 operating season. Please define the operating season, and provide
26 Hydro's current estimate as to when the diesel plant will be fully
27 functional as a black start facility. Please provide an indication of
28 the cost savings if the in-service date of the diesel plant black start
29 project were delayed to coincide with the 2014 – 2015 operating
30 season.

31

- 1 CA-NLH-11 (Re: November 2013 Report to Board on Holyrood Black Start
2 Analysis, Summary) Hydro indicates an exemption will be
3 required from the Department of Environment and Conservation in
4 order to avoid missing the 2013 – 2014 peak load period. Was this
5 exemption granted, and if so, was it granted with any conditions?
6
- 7 CA-NLH-12 (Re: November 2013 Report to Board on Holyrood Black Start
8 Analysis, page 7) Hydro states “there is expected to be some
9 discrepancy between predicted electrical behaviour and the real
10 world system behaviour”. Has Hydro been able to calibrate
11 modeling results to the real world in an effort to provide greater
12 comfort that the diesel plant solution will indeed work in the real
13 world system?
14
- 15 CA-NLH-13 (Re: November 2013 Report to Board on Holyrood Black Start
16 Analysis, page 7) Has Hydro modeled the 60 MW combustion
17 turbine to determine if it can meet the requirements for black start?
18
- 19 CA-NLH-14 (Re: November 2013 Report to Board on Holyrood Black Start
20 Analysis, page 10) Has weather affected the schedule for the diesel
21 plant?
22
- 23 CA-NLH-15 Please describe the role of the Holyrood black start function during
24 the supply disruptions on the Island Interconnected System during
25 the period January 2 - 6, 2014.
26
- 27 CA-NLH-16 Have the supply disruptions on the Island Interconnected System
28 during the period January 2 – 6, 2014 period changed Hydro’s
29 opinion of what is needed for black start at Holyrood? For
30 example, is it desirable to abort the diesel plant black start
31 alternative and advance the 60 MW combustion turbine project?

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

CA-NLH-17 In the opinion of Hydro operating staff, can Hardwoods adequately meet black start requirements at Holyrood? Does the Hardwoods black start alternative meet NERC and NPCC standards with respect to black start? Please explain why or why not.

CA-NLH-18 What is the function of the forced draft fans at Holyrood? Are they needed to evacuate smoke?

CA-NLH-19 Please file a copy of Hydro's emergency preparedness and system restoration plans.

Dated at St. John's in the Province of Newfoundland and Labrador, this 15th day of January, 2014.



Thomas Johnson
Consumer Advocate
323 Duckworth Street
St. John's, NL A1C 5X4
Telephone: (709) 726-3524
Facsimile: (709) 726-9600
Email: tjohnson@odeaearle.ca