



Cabot Place, 1100 – 100 New Gower Street, P.O. Box 5038
St. John's NL A1C 5V3 Canada tel: 709.722.4270 fax: 709.722.4565 stewartmckelvey.com

February 6, 2015

Paul L. Coxworthy
Direct Dial: 709.570.8830
pcoxworthy@stewartmckelvey.com

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 – 2015 Interim Rates Application
Requests for Information TIR-IC-NLH-1 to TIR-IC-NLH-6**

In relation to the above noted application please find enclosed one (1) original and twelve (12) copies of the Requests for Information of the Island Industrial Customers Group numbered TIR-IC-NLH-1 to TIR-IC-NLH-6

We trust the foregoing is found to be in order.

Yours truly,

Stewart McKelvey

Paul L. Coxworthy

PLC/kmcd

Enclosures

- 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
Senwung Luk, Olthuis, Kleer, Townshend LLP
Yvonne Jones, MP, Labrador
Genevieve M. Dawson, Benson Buffett

IN THE MATTER OF the *Electrical Power Control Act*, 1994, 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, pursuant to Sections 70 and 75 of the Act, for the approval of customer electricity rates, rules and regulations on an interim basis to become effective March 1, 2015 (the "2015 Interim Rates Application").

**ISLAND INDUSTRIAL CUSTOMERS GROUP
REQUESTS FOR INFORMATION
TIR-IC-NLH-1 to TIR-IC-NLH-6**

Issued: February 6, 2015

IN THE MATTER OF the *Electrical Power Control Act*, 1994, 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, pursuant to Sections 70 and 75 of the Act, for the approval of customer electricity rates, rules and regulations on an interim basis to become effective March 1, 2015 (the "2015 Interim Rates Application").

REQUESTS FOR INFORMATION OF
THE ISLAND INDUSTRIAL CUSTOMERS GROUP
TIR-IC-NLH-1 to TIR-IC-NLH-6

TIR-IC-NLH-1

Please provide revised version of Table 2 (**page 9, 2015 Interim Rates Application Evidence**) using 2016 forecast billing determinants for the "January 1, 2016" and "September 1, 2016" columns.

TIR-IC-NLH-2

Please provide revised versions of Table 2 and Table 3 (**page 9, 2015 Interim Rates Application Evidence**) assuming the IC RSP current plan balance of \$6.8 million by end of 2014 would be recovered over a two-year period as proposed by Hydro in the 2013 Amended GRA Application (**Section 4.6.5: Phase-in of Island Industrial Customer Rates**).

TIR-IC-NLH-3

Please confirm that the updated fuel price will also have impact to the rate base through lower fuel inventory cost.

TIR-IC-NLH-4

Please provide revised versions of Tables 2 and 3 (**page 9, 2015 Interim Rates Application Evidence**) and a comparison of the rates being sought for Newfoundland Power (NP) and IC for March 1, 2015 for each of the following scenarios:

- a. Hydro's proposal per the January 28, 2015 Interim Rate Application.

- 1 b. An alternative scenario where only \$2.1 million of the
2 load variation credit is allocated to the IC and no other
3 allocation of the deferred load variation is undertaken
4 at this time (i.e., the remainder stays as a segregated,
5 deferred balance in the RSP). All other proposals as
6 per Hydro's interim rate application.
- 7 c. An alternative scenario where no allocation of the
8 load variation credit in the RSP is undertaken at this
9 time.

10 **TIR-IC-NLH-5**

11 Please provide an estimate of the division of the current
12 deferred load variation balance between customer classes
under the following scenarios:

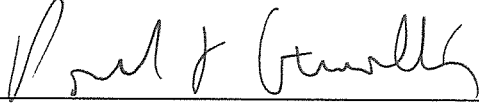
- 13 a. Divided based on energy ratios for 2015 forecast
14 consumption.
- 15 b. Divided based on a first allocation to eliminate any
16 negative balances in the RSP as at December 31,
17 2014 (amounts owing from customers) and the
18 remainder allocated based on 2015 forecast energy
19 ratios.
- 20 c. Divided based on the same ratio as the Government
21 directed allocation of the pre-Sept 2013 load variation
22 balance.
- 23 d. Divided only to address RSP negative balances as of
24 Dec 31, 2014, and the remainder used for common
25 benefit of Hydro's customers to address rate impacts
26 not yet addressed as part of the GRA base rates
27 (e.g., 2014 revenue deficiency, 2015 shortfalls for
28 January and February, CDM balances otherwise
29 proposed to be collected via rider, reliability hearing
30 and capacity assistance costs not yet proposed for
31 recovery that are expected to be recovered through
32 future riders, etc.).

33 **TIR-IC-NLH-6**

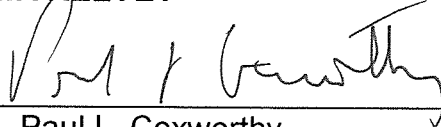
34 Please confirm that an interim order of the Board that
35 approves only (a) a \$2.1 million allocation of the deferred
36 load variation provision to the IC, (b) the one-time transfers
37 of IC phase-in funds as proposed by Hydro, and (c) a
38 suspension of the NP RSP fuel rider as of March 1, 2015,
39 gives the same rate impact outcomes as sought by Hydro
with fewer allocation commitments by the Board at this time.

DATED at St. John's, in the Province of Newfoundland and Labrador, this 6th day of February, 2015.

POOLE ALTHOUSE

for 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, Q.C., 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: Thomas J. O'Reilly, Q.C.

TO: Miller & Hearn
450 Avalon Drive
PO Box 129
Labrador City NL A2V 2K3

Attention: Edward M. Hearn Q.C.

TO: Olthuis, Kleer, Townshend LLP
229 College Street, 3rd Floor
Toronto ON M5T 1R4

Attention: Senwung Luk

TO: House of Commons
Confederation Building
Room 682
Ottawa ON K1A 0A6

Attention: Yvonne Jones, Member of Parliament, Labrador

TO: Benson Buffett
Suite 900, Atlantic Place
P.O. Box 1538, Stn. C.
215 Water Street
St. John's NL A1C 5N8

Attention: Genevieve M. Dawson