IN THE MATTER OF the Public Utilities Act, RSNL 1990, Chapter P-47 (the Act); and

**IN THE MATTER OF** capital expenditures And rate base of Newfoundland Power Inc.; and

IN THE MATTER OF an application by Newfoundland Power Inc. for an order pursuant To Sections 41 and 78 of the Act:

- (a) approving a 2013 Capital Budget of \$80,788,000;
- (b) approving certain capital expenditures related to multi-year projects commencing in 2013; and
- (c) fixing and determining a 2011 rate base of \$876,356,000.

## Requests for Information by the Consumer Advocate

## CA-NP-01 to CA-NP-80

## July 20, 2012

1	CA-NP-01	Re: Hydro Plant Production Increase, Schedule B, Pages 4, 5 and 6 of 93
2		Newfoundland Power outlines at pages 4 and 5 the costs of the new runners for
3		New Chelsea (\$653,000.00) and Pittmans Pond (\$475,000.00). Newfoundland
4		Power also outlines the efficiency increases for both. New Chelsea is forecast
5		to have a best efficiency increase of 6% and a maximum load efficiency of 2%
6		compared to Pittmans at 16% and 18% respectively. Does Newfoundland
7		Power have an efficiency increase it considers to be justifiable when proposing
8		these projects? Is there an industry standard and if so, what is it?
9		
10	CA-NP-02	Re: Hydro Plant Production Increase, Schedule B, Pages 4, 5 and 6 of 93
11		Why does Newfoundland Power use different durations for the New Chelsea and
12		Pittmans Pond projects as regards to estimating the levelized cost of energy (50
13		years and 25 years respectively)?
14		

1	CA-NP-03	Re: Hydro Plant Production Increase, Schedule B, Pages 4, 5 and 6 of 93
2		The efficiency analysis for Pittmans Pond was completed by Hatch in 1997.
3		Have there been any updates to this analysis? Please provide a copy of the
4		analysis if not already provided and any updates.
5		
6	CA-NP-04	Re: Extensions, Schedule B, Pages 33 and 34 of 93
7		Please provide the economic projections relied on by Newfoundland Power.
8		
9	CA-NP-05	Re: Extensions, Schedule B, Pages 33 and 34 of 93
10		Please provide a breakdown of new customers from 2008 to 2011 by region?
11		
12	CA-NP-06	Re: Meters, Schedule B, Pages 35, 36 and 37 of 93
13		Please provide an amended Table 3 to include the unit cost projection for the
14		years 2013 to 2017, incorporating the proposed new meter strategy outlined in
15		the report at Tab 4.3.
16		
17	CA-NP-07	Re: Standby and Emergency Power – Duffy Place, Schedule B, Pages 67 and
18		68 of 93
19		How long has the UPS system(s) been in place at other Customer Contact
20		Centres outside of the St. John's Region?
21		
22	CA-NP-08	Re: Purchase Vehicles and Aerial Devices, Schedule B, Pages 70, 71 and 72
23		of 93
24		Please provide a listing of all makes, models, year and kilometers for all vehicles
25		Newfoundland Power is seeking to replace in 2013.
26		
27	CA-NP-09	Re: Personal Computer Infrastructure, Schedule B, Pages 83, 84 and 85 of
28		93
29		Newfoundland Power states that it is currently able to achieve a 5 year life cycle
30		for its PCs. Is there an industry practice for the replacement of PCs and if so,
31		what is the industry practice?
32		
33	CA-NP-10	Re: Personal Computer Infrastructure, Schedule B, Pages 83, 84 and 85 of
34		93

1		Please provide the year of purchase for the printers and other associated
2		equipment Newfoundland Power intends to replace.
3		
4	CA-NP-11	Re: Personal Computer Infrastructure, Schedule B, Pages 83, 84 and 85 of
5		93
6		Please provide the rationale for concluding that both PCs and printers need to be
7		replaced at the same time.
8	CA-NP-12	Do: Notwork Infrastructure Schodule D. Dorge SS and SO of CO
9	CA-NP-12	Re: Network Infrastructure, Schedule B, Pages 88 and 89 of 93
10		Newfoundland Power states that "the equipment which facilitates
11		communication between the Company's shared servers and related
12 13		application" is eight (8) years old and requires replacing. What is the industry
14		standard for replacing such equipment?
15	CA-NP-13	Re: Network Infrastructure, Schedule B, Pages 88 and 89 of 93
16	OA IVI - IO	Please provide a listing of all Network Infrastructure break downs, the down time,
17		cause, and whether any information was lost over the last five (5) years.
18		cause, and whether any information was lost over the last live (3) years.
19	CA-NP-14	Re: 2012 Capital Expenditure Status Report, Appendix A, Page 1 of 6
20	2,,,,,	Please provide the confirmation received from DFO for extending the
21		implementation plan.
22		p.eee
23	CA-NP-15	Re: 2012 Capital Expenditure Status Report, Appendix A, Page 2 of 6
24		Please provide the locations of the substation switches which require
25		replacement after the December 2011 thermo scanning.
26		
27	CA-NP-16	Re: 2012 Capital Expenditure Status Report, Appendix A, Page 5 of 6
28		What is the progress of Newfoundland Powers re-evaluation of its Fibre Optic
29		Replacement requirements?
30		
31	CA-NP-17	Re: Tab 1.1 - 2013 Facility Rehabilitation
32		What are the guidelines established by the Canadian Dam Association? Please
33		provide the applicable sections.
34		

1	CA-NP-18	Re: Tab 1.1 - 2013 Facility Rehabilitation
2		How often does Newfoundland Power undertake dam safety inspections?
3		
4	CA-NP-19	Re: Tab 1.1 - 2013 Facility Rehabilitation – Three Island Spillway
5		When did Newfoundland Power first become aware of the issues surrounding the
6		Three Island Pond Spillway?
7		
8	CA-NP-20	Re: Tab 1.1 - 2013 Facility Rehabilitation – Cochrane Pond Outlet
9		Are there any warning signs or markers located at the Cochrane Pond Outlet?
10		
11	CA-NP-21	Re: Tab 1.1 - 2013 Facility Rehabilitation – Soldiers Pond Outlet
12		When were the lower sections of the gabion wing walls installed and what
13		maintenance has been carried out on these over the past 5 years?
14		
15	CA-NP-22	Re: Tab 1.1 - 2013 Facility Rehabilitation – Soldiers Pond Outlet
16		At p. 5 of the report at Tab 1.1, it states that "The wing walls do not have safety
17		railings as they cannot be accommodated with the existing design. A more
18		robust wing wall design that incorporates appropriate safety measures is
19		required." Figure 12 shows that access to the wing walls is already blocked off
20		by fencing at the top of the structure. Is there a safety code provision or other
21		legislative or regulatory provision that would require further railings along the
22		wing walls?
23		
24	CA-NP-23	Re: Tab 1.1 - 2013 Facility Rehabilitation – Soldiers Pond Outlet
25		What would be the cost of only shoring up the gabion baskets to address the
26		perceived corrosion issues and leaving aside the installation of a "more robust
27		wing wall design that incorporates appropriate safety measures" as described
28		by Newfoundland Power at p. 5 of the report.
29		
30	CA-NP-24	Re: Tab 1.2 - Hearts Content Plant Penstock Refurbishment
31		Does the proposed budget for this project include the other civil works, such as
32		the construction of an access road, outlined by Newfoundland Power (pg. 3)?
33		
34	CA-NP-25	Re: Tab 1.2 - Hearts Content Plant Penstock Refurbishment

1		Are the other civil works included under section 6.0?
2		
3	CA-NP-26	Re: Tab 1.2 - Hearts Content Plant Penstock Refurbishment
4		If the other civil work required for this project is not included, does Newfoundland
5		Power have an estimate as to the cost of same?
6		
7	CA-NP-27	Re: Tab 1.3 - New Chelsea Hydro Plant Runner Replacement and Rewind
8		Please provide a copy of the Hatch 2001 Study referred to by Newfoundland
9		Power.
10		
11	CA-NP-28	Re: Tab 1.3 - New Chelsea Hydro Plant Runner Replacement and Rewind
12		Has there been an update to the Hatch Report?
13		
14	CA-NP-29	Re: Tab 1.3 - New Chelsea Hydro Plant Runner Replacement and Rewind
15		What is the peak load for the generator?
16		
17	CA-NP-30	Re: Tab 1.3 - New Chelsea Hydro Plant Runner Replacement and Rewind
18		Will the anticipated increase as a result of replacing the existing turbine still be
19		within the limits for the generator?
20		
21	CA-NP-31	Re: Tab 1.4 - Pitmans Pond Hydro Plant Replacement – Gate Positioner
22		Please provide any maintenance logs on the Gate Positioner.
23		
24	CA-NP-32	Re: Tab 1.4 - Pitmans Pond Hydro Plant Replacement – Gate Positioner
25		Currently, are there any mechanical issues with the Gate Positioner?
26		
27	CA-NP-33	Re: Tab 1.4 - Pitmans Pond Hydro Plant Replacement – Gate Positioner
28		How long has the Gate Positioner been considered obsolete? When did the
29		manufacturer cease supporting the Gate Positioner?
30		
31	CA-NP-34	Re: Tab 1.4 - Pitmans Pond Hydro Plant Replacement – Protective Relaying
32		Newfoundland Power outlines that the existing protective relaying situate at
33		Pitmans Pond lacks (3) elements of the minimum protection set. How long have
34		these elements been missing?

CA-NP-35	Re: Tab 1.4 - Pitmans Pond Hydro Plant Replacement - Turbine
	How long has the turbine seal at Pitmans Pond been leaking?
CA-NP-36	Re: Tab 1.4 - Pitmans Pond Hydro Plant Replacement – Overhead Crane
	What is the difficulty with one (1) person operating the overhead crane? How
	often is one (1) person required to do so?
CA-NP-37	Re: Tab 1.4 - Pitmans Pond Hydro Plant Replacement – Overhead Crane
	Please provide all documented complaints received from employees over the last
	five (5) relating to the overhead crane at Pitmans Pond.
CA-NP-38	Re: Tab 1.4 - Pitmans Pond Hydro Plant Replacement – Overhead Crane
0, ( ) (1	Please provide the monthly usage of the overhead crane at Pitmans Pond for the
	last two (2) years.
	(a) y care.
CA-NP-39	Re: Tab 1.4 - Pitmans Pond Hydro Plant Replacement – Overhead Crane
	What is the actual cost of the overhead crane upgrade in the overall plant
	refurbishment?
CA-NP-40	Re: Tab 2.1 - 2013 Substation Refurbishment and Modernization –
	Substation Monitoring and Operations
	Reference p. 15 of the report at Tab 2.1, in which facilities will the upgrading of
	the hubs be taking place?
CA-NP-41	Re: Tab 2.1 - 2013 Substation Refurbishment and Modernization –
	Substation Monitoring and Operations
	Reference p. 16 of the report at Tab 2.1, where it states, "This item involves
	installing meters and communications equipment at 13 Hydro infeed locations to
	collect these data points on the Company's SCADA system. These additional
	data points will provide Newfoundland Power with a more accurate measurement
	of the total instantaneous system load." Are these infeed locations already
	monitored through meters connected to the company's SCADA system? If so,
	what standard of accuracy is the company employing in its determination that
	CA-NP-36  CA-NP-38  CA-NP-39  CA-NP-40

1		more accuracy is necessary?
2		
3	CA-NP-42	Re: Tab 2.1 - 2013 Substation Refurbishment and Modernization –
4		Substation Monitoring and Operations
5		Please provide a more detailed breakdown of the \$432,000 budgeted for
6		Substation Monitoring and Operations.
7		
8	CA-NP-43	Re: Tab 2.1 - 2013 Substation Refurbishment and Modernization – Portable
9		Substation P4
10		How many failures, and over what time period, have occurred to the alarm
11		annunciation panel for the portable substation P4?
12		
13	CA-NP-44	Re: Tab 2.1 - 2013 Substation Refurbishment and Modernization –
14		Stephenville Gas Turbine
15		Newfoundland Power outlines that for the Stephenville Gas Turbine Substation
16		the ground grid will be extended. How large is the ground grid currently? What
17		is the industry practice?
18		
19	CA-NP-45	Re: Tab 4.2 - Feeder Additions for Load Growth – Relocate SJM-07
20		Has Newfoundland Power ever had any issues with duct banks failing over the
21		last ten (10) years? If so, please provide details of same.
22		
23	CA-NP-46	Re: Tab 4.3 - 2013 Metering Strategy
24		At p. 2, footnote 2, it states that on average 345 meters can be read in one route
25		and it notes that the number of actual meters in a route may vary. Does the
26		company have predominately AMR meter routes where the meters read per
27		route are presently equal to or greater than the 611 forecasted for 2017 in Table
28		6 (at p. 8).
29		
30	CA-NP-47	Re: Tab 4.3 - 2013 Metering Strategy
31		What is the average life for a new AMR and a new non-AMR meter?
32		
33	CA-NP-48	Re: Tab 4.3 - 2013 Metering Strategy
34		Are AMR meters more accurate than non-AMR meters?

1		
2	CA-NP-49	Re: Tab 4.3 - 2013 Metering Strategy
3		At p. 5, Newfoundland Power explains that it has developed a transition strategy
4		for compliance with the new legislation. The company states that it must be
5		compliant for electromechanical meters by January 2014. Please explain how
6		the company will be considered compliant with the new legislation by January
7		2014 by reason of the adoption of its strategy.
8		
9	CA-NP-50	Re: Tab 4.3 - 2013 Metering Strategy
10		Please explain how compliance with the new changes in legislation differs
11		depending upon whether the company elects to use AMR vs. non-AMR meters
12		for all of its future meter needs.
13		
14	CA-NP-51	Re: Tab 4.4 - Rebuild Distribution Lines Update
15		Please provide details of Newfoundland Power's preventative maintenance
16		program referred to at page 2.
17		
18	CA-NP-52	Re: Tab 4.4 - Rebuild Distribution Lines Update – Stainless Steel Pole
19		Mounted Transformer Hanging Brackets
20		Newfoundland Power outlines it had discussions with the manufacturer of the
21		hanging brackets. Please provide all written correspondence between
22		Newfoundland Power and the manufacturer regarding the hanging brackets.
23		
24	CA-NP-53	Re: Tab 4.4 - Rebuild Distribution Lines Update - Stainless Steel Pole
25		Mounted Transformer Hanging Brackets
26		What type of bracket is being used as a replacement? When and by whom
27		were these brackets tested and under what conditions?
28		
29	CA-NP-54	Re: Tab 5.1 - 2013 Company Building Renovations
30		At p. 2 of the report at Tab 5.1, 5 items are identified as regards the scope of
31		work to be completed in 2013. What is the breakdown of the costs of the 5
32		items?
33		
3/1	CA-NP-55	Re: Tab 5.1 - 2013 Company Building Renovations

	As regards the plan to replace the exterior metal siding and metal roofing on the
	warehouse, while the photos at figures 5 to 7 depict some evidence of corrosion
	on the roof, exterior siding and eave, these appear to be surface corrosion issues
	and the report does not refer to any leak issues in respect of these areas. Does
	Newfoundland Power have any evidence that the warehouse siding and roof are
	so compromised as to require complete replacement as opposed to re-painting
	or other repair?
CA-NP-56	Re: Tab 5.1, Company Building Renovations
	Why has mildew been allowed to build up on the warehouse's exterior siding as
	shown on Figure 7? Does anyone have responsibility for removal of such
	mildew at the warehouse facility?
CA-NP-57	Re: Tab 5.1 - 2013 Company Building Renovations
	For the Carbonear location, please provide the cause of the three (3) floods over
	the last decade. Is Hurricane Igor included in the three (3) floods referred to?
CA-NP-58	Re: Tab 5.1 - 2013 Company Building Renovations
	Has Newfoundland Power confirmed that there is water ingress behind the brick
	at the Carbonear location? Please provide same.
CA-NP-59	Re: Tab 5.1 - 2013 Company Building Renovations
	What is the square footage of the area which requires carpet replacement?
CA-NP-60	Re: Tab 5.1 - 2013 Company Building Renovations
	How much money is budgeted for the refurbishment of all 8 washrooms of the
	Kenmount Road Building?
CA-NP-61	Re: Tab 5.1 - 2013 Company Building Renovations
	As regards Figures 7, 8, 9 and 10, showing the "Typical Bathroom Finishings"
	and "Typical Bathroom Fixtures", it is not evident what the problem is with these
	washroom facilities. Please explain what Newfoundland Power intended to
	convey by providing photos of its bathroom facilities.
	CA-NP-58  CA-NP-59  CA-NP-60

1	CA-NP-62	Re: Tab 5.1 - 2013 Company Building Renovations
2		Please provide all maintenance records and expenditures for the past 3 years in
3		relation to the washroom facilities.
4		
5	CA-NP-63	Re: Tab 5.1 - 2013 Company Building Renovations
6		Please provide details of the current security infrastructure currently in place.
7		
8	CA-NP-64	Re: Tab 6.1 - Mobile Radio System Replacement
9		How does a trunked system determine priorities between various user groups?
10		
11	CA-NP-65	Re: Tab 6.1 - Mobile Radio System Replacement
12		Please provide a copy of Newfoundland Power's report which was presented in
13		response to Information PUB-22-NP, Attachment A of the NLH 2005 Capital
14		Budget Application (referred to at p. 1 of Report 6.1 to Newfoundland Power's
15		2013 Capital Budget Application)
16		
17	CA-NP-66	Re: Tab 6.1 - Mobile Radio System Replacement
18		What information does Newfoundland Power have as regards Newfoundland and
19		Labrador Hydro's experience and level of satisfaction with the Bell Mobility
20		trunked radio system which Newfoundland Power has proposed moving to?
21		
22	CA-NP-67	Re: Tab 6.1 - Mobile Radio System Replacement
23		At p. 6 of the report at Tab 6.1, footnote 19, it references the fact that
24		decommissioning costs have not been included in alternative 2 (i.e. moving to
25		Bell trunked radio system). Does the company have an order of magnitude of
26		these costs and, if so, can it indicate how the company's net present value
27		analysis is impacted by this consideration?
28		
29	CA-NP-68	Re: Tab 7.1 - 2013 Application Enhancements – Customer Service Systems
30		Enhancements
31		Does Newfoundland Power foresee costs with training employees with the
32		proposed Customer Service Systems Enhancements? Are there associated
33		costs with updates, etc.?
34		

1	CA-NP-69	Re: Tab 7.1 - 2013 Application Enhancements – Customer Call-back
2		Technology
3		Please provide records of all customer complaints received over the last two (2)
4		years which are based on the wait time experienced.
5	CA-NP-70	Re: Tab 7.1 - 2013 Application Enhancements – Group Billing Enhancements
6	CA-NF-70	Re: Tab 7.1 - 2013 Application Enhancements – Group Billing Enhancements What percentage of Newfoundland Power's customers have multiple accounts?
7 8		what percentage of Newtoundiand Fower's customers have multiple accounts?
9	CA-NP-71	Re: Tab 7.1 - 2013 Application Enhancements – Group Billing Enhancements
10	<b>3</b> , , , , , ,	Please provide details as to the "significant efforts on a daily basis to ensure
11		the changes are done properly and billing statements are acceptable to
12		customers."
13		
14	CA-NP-72	Re: Tab 7.1 - 2013 Application Enhancements – Group Billing Enhancements
15		At p. 8 of the report at Tab 7.1, it states, "In order to provide an acceptable level
16		of service to these customers, CCC representatives often manually revise bills to
17		meet customer needs." What are the most common types of revisions referred
18		to?
19		
20	CA-NP-73	Re: Tab 7.1 - 2013 Application Enhancements – Group Billing Enhancements
21		At p. 8 it states that "Group Billing options are currently offered to approximately
22		300 customers and 6,500 accounts." The evidence at p. 8 states that "Group
23		Billing provides a consolidated electricity bill for customers with multiple accounts
24		and electronic data file containing billing details for each individual account
25		owned by the customer. With this information, customers can better manage
26		their electricity charges and payments." What more is required in order to
27		provide an acceptable level of service to these customers and why is this not
28		already an acceptable level of service?
29		
30	CA-NP-74	Re: Tab 7.1 - 2013 Application Enhancements – Customer Service Internet
31		Enhancements
32		What is the percentage of Newfoundland Power's delinquent accounts over two
33		(2) months or more?
34		

1	CA-NP-75	Re: Tab 7.1 - 2013 Application Enhancements – Customer Service Internet
2		Enhancements
3		What is the percentage of delinquent accounts of two (2) months or more
4		currently making payments on a regular basis?
5		
6	CA-NP-76	Re: Tab 7.1 - 2013 Application Enhancements - Customer Service Internet
7		Enhancements
8		Since 2010 over 6,900 alternate payment arrangements have been made online.
9		How many alternate payment arrangements have been made by voice response
10		technology?
11		
12	CA-NP-77	Re: Tab 7.1 - 2013 Application Enhancements – Customer Service Internet
13		Enhancements
14		Newfoundland Power estimates a cost of \$50,000.00 to improve the online
15		payment arrangement. Does this mean that the remaining \$222,000.00 sought
16		is solely for telephone self service?
17		
18	CA-NP-78	Re: Tab 7.1 - 2013 System Upgrades – Asset Management System (Avantis)
19		Upgrade
20		How long has Newfoundland Power used the current version of Avantis and how
21		long does Newfoundland Power expect to use the version proposed to be
22		acquired in 2013?
23		
24	CA-NP-79	Re: Tab 7.1 - 2013 System Upgrades – Asset Management System (Avantis)
25		Upgrade
26		At p. 2 it states that, "The version currently used by the Company will no longer
27		be supported by the vendor after 2013." Does this mean that the vendor will be
28		available to provide support during 2013? If so, why not delay the project for a
29		year?
30		
31	CA-NP-80	Re: Tab 7.1 - 2013 System Upgrades – Asset Management System (Avantis)
32		Upgrade
33		Please provide confirmation from the vendor that the version currently used by
34		Newfoundland Power will no longer be supported by it after 2013.

1	
2	
3	
4	Dated at St. John's in the Province of Newfoundland and Labrador, this 20 <sup>th</sup> day of July, 2012.
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7	
8	JAN JA
9	
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