

IN THE MATTER OF the *Public Utilities Act*, (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 2014 Capital Budget of \$84,462,000; and
- (b) fixing and determining a 2012 rate base of \$883,045,000.

Requests for Information by the Consumer Advocate

**CA-NP-01 to CA-NP-11
July 23, 2013**

1 **CA-NP-01 Reference:** Schedule B, 2014 Capital Projects – Normal Capital (Historical
2 Pattern) Rebuild Distribution Lines (Pooled) page 44 of 85:

3 The Company outlines at page 46 of 85 that "Inspections for the lines upon which work is to
4 take place in 2014 are ongoing throughout 2013. Complete inspection data will not be
5 available until late 2013; therefore the 2014 budget estimate is based on average historical
6 expenditures." Can the Company postpone submitting this project until the end of 2013 in
7 order to get an accurate assessment of cost and submit this project to the Board at that time?
8

9 **CA-NP-02 Reference:** Schedule B, 2014 Capital Projects – Normal Capital (Historical
10 Pattern) Rebuild Distribution Lines (Pooled) page 44 of 85:

11 This project is a \$3,462,000 project that the application states is based on historical
12 expenditures. Please explain how the 2014 estimate was arrived at in light of the Expenditure
13 History from 2009 to 2013F found at Table 2 at page 45 of 85.
14
15

1 **CA-NP-03 Reference:** Schedule B, 2014 Capital Projects – Normal Capital (Historical
2 Pattern) Relocate/Replace Distribution Lines for Third Parties (Pooled) page 47 of 85:

3 Please provide the breakdown over the last four years for work:

4 (a) initiated by municipal, provincial and federal governments;

5 (b) initiated by other utilities; and

6 (c) initiated by customers;

7 in the relocation of replacement of distribution lines for third parties.
8

9 **CA-NP-04 Reference:** Schedule B, 2014 Capital Projects – Normal Capital (Historical
10 Pattern) Relocate/Replace Distribution Lines for Third Parties (Pooled) page 47 of 85:

11 Please provide a copy of the Company's policy respecting contributions in aid of construction for
12 requests made by customers.
13

14 **CA-NP-05 Reference:** Schedule B, 2014 Capital Projects – Normal Capital (Historical
15 Pattern) Relocate/Replace Distribution Lines for Third Parties (Pooled) page 47 of 85:

16 Please provide the relevant excerpts of the arguments that are in place with requesting parties.
17

18 **CA-NP-06 Reference:** Schedule B, 2014 Capital Projects – Normal Capital (Historical
19 Pattern) Relocate/Replace Distribution Lines for Third Parties (Pooled) page 47 of 85:

20 At page 48 of 85 it states that "Estimated contributions from customers and requesting parties
21 associated with this project are included in the estimated contributions in aid of construction
22 referred to in the Application." Paragraph 2 of the formal Application states that the Company
23 has estimated an amount of \$1,500,000 in aid of contribution that it intends to demand from its
24 customers in 2014. Please provide a history of the contributions in aid of construction paid and
25 forecast to be paid from 2009 to 2014 by each of the categories of requesting parties.
26

27 **CA-NP-07 Reference:** Schedule B, 2014 Capital Projects – Normal Capital (Historical
28 Pattern) Relocate/Replace Distribution Lines for Third Parties (Pooled) page 47 of 85:

29 At page 48 of 85 the Company states that over the 2011 to 2013, expenditures have increased
30 as a result of the Bell Aliant FibreOp build out. Please indicate the amount of expenditures
31 attributable to this build out.
32
33
34

1 **CA-NP-08 Reference:** Schedule B, 2014 Capital Projects-Normal Capital (Identified
2 Need) Purchase Vehicles and Aerial Devices (Pooled):

3 Please provide a listing of all vehicles, along with model year and kilometers to date.
4

5 **CA-NP-09 Reference:** Tab 1.1 2014 Facility Rehabilitation – Cape Broyle Spillway

6 Please provide the public safety requirements referred to by the Company at page 3.
7

8 **CA-NP-10 Reference:** Tab 1.3 Hydro Production Increase – La Manche Canal:

9 At page 3 the Company states that “Based on review of the relevant legislation it was
10 determined that increasing the height of the Cape Pond Dam would not be permitted because
11 Cape Pond is within the boundary of the Avalon Wilderness Reserve Area.” For the record,
12 please file a copy of the relevant legislation.
13

14 **CA-NP-11 Reference:** Tab 1.3 Hydro Production Increase – La Manche Canal:

15 Please detail any communications or consultations the Company has undertaken, if any, with
16 Government departments/officials as regards to exploring whether it would be permissible to
17 proceed with raising the height of the Cape Pond Dam in order to reduce spills?
18

19 Dated at St. John’s in the Province of Newfoundland and Labrador, this 23rd day of July, 2013.
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