



March 7, 2016

Board of Commissioners
of Public Utilities
P.O. Box 21040
120 Torbay Road
St. John's, NL A1A 5B2

Attention: G. Cheryl Blundon, Director of Corporate Services and Board Secretary

Ladies and Gentlemen:

**Re: Newfoundland and Labrador Hydro – Application for Approval of the Procurement of 12 MW of Diesel Generation at Holyrood (dated February 22, 2016)
Requests for Information**

Please find enclosed one (1) original and twelve (12) copies the Consumer Advocate's Requests for Information numbered DG-CA-NLH-01 to DG-CA-NLH-06 in relation to the above noted application.

A copy of this letter, together with enclosures, has been forwarded directly to the parties listed below.

We trust the enclosed to be in order.

Yours very truly,

O'DEA, EARLE

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

THOMAS JOHNSON, Q.C.
TJ/cel

cc: Newfoundland Power
Attention: Mr. Gerard Hayes



Newfoundland and Labrador Hydro
Attention: Mr. Geoffrey Young

Stewart McKelvey
Attention: Mr. Paul Coxworthy

Cox & Palmer
Attention: Thomas O'Reilly, Q.C.

Praxair Canada Inc.
Attention: Ms. Sheryl Nisenbaum

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

a revised Application by Newfoundland and Labrador
Hydro (Hydro) pursuant to Subsection 41(3) of the
Act, for approval of the procurement of 12 MW
of diesel generation at Holyrood.

**CONSUMER ADVOCATE
REQUESTS FOR INFORMATION
DG-CA-NLH-1 to DG-CA-NLH-6**

Issued: March 7, 2016

1 DG-CA-NLH-01 (February 19, 2016 Report to Board “*Purchase 12 MW of Diesel*
2 *Generation (Revised) Holyrood*”) In the previous November 22,
3 2015 application that has since been withdrawn, Hydro’s response
4 to CA-NLH-003 states (page 2 of 2, lines 2 to 5) “*having*
5 *additional generation provides benefits to the system, but as it is*
6 *not required to meet Hydro’s generation reliability criteria, the*
7 *economic benefit was not included in the cost-benefit analysis.*” In
8 the February 19, 2016 report attached to the current application,
9 Hydro states (page 7, lines 19 to 21) “*The results of the analysis*
10 *indicate that the Holyrood diesel generators are required to supply*
11 *a P90 peak loading condition in the event of a single worst case*
12 *contingency.*” What happened in the 3 month period since the
13 filing of the November 22, 2015 application (that has since been
14 withdrawn) that changed Hydro’s view relating to the need for the
15 diesel units to meet its system planning criteria? Are the system
16 planning criteria used in the current application appropriate for use
17 in short-term or long-term planning, and if long-term, why was this
18 need not identified last November?

19
20
21 DG-CA-NLH-02 (February 19, 2016 Report to Board “*Purchase 12 MW of Diesel*
22 *Generation (Revised) Holyrood*”) Table 2 (page 8) indicates that
23 loading without Holyrood diesels generation would be 102.1%.
24 Hydro indicates that this is a violation of its planning criteria.
25 Please provide an indication of the length of time that this
26 overloading would be expected, and explain under what
27 conditions, if any, line overloading is acceptable; i.e., very low
28 probability events, very short periods of time of the overloading,
29 very small percentage of overloading, etc.

30
31 DG-CA-NLH-03 (February 19, 2016 Report to Board “*Purchase 12 MW of Diesel*
32 *Generation (Revised) Holyrood*”) On page 11, line 8 it is stated

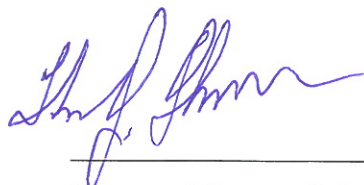
1 “Hydro continues to see strong load growth”. On page 3, lines 5 to
2 6, Hydro states “It is noted that the projected rate of load growth is
3 significantly reduced from what has been experienced in recent
4 years.” Which is it? Please provide a comparison of the load
5 forecasts used in the November 22, 2015 application (since
6 withdrawn) versus the forecast used in the current application.

7
8 DG-CA-NLH-04 (February 19, 2016 Report to Board “Purchase 12 MW of Diesel
9 Generation (Revised) Holyrood”, page 13) Please confirm that the
10 additional two diesel units will not be needed to meet Hydro’s
11 system planning criteria and explain why.

12
13 DG-CA-NLH-05 (February 19, 2016 Report to Board “Purchase 12 MW of Diesel
14 Generation (Revised) Holyrood”, Section 3.4) Please provide an
15 explanation of the impact that the low hydro conditions have had
16 on the economic analysis of purchasing the diesel units.

17
18 DG-CA-NLH-06 (February 19, 2016 Report to Board “Purchase 12 MW of Diesel
19 Generation (Revised) Holyrood”, Section 4.4) Please provide the
20 economic analysis including the impact of the potential
21 legislative/regulatory requirement that stacks be installed on each
22 of the 6 diesel units.

Dated at St. John's in the Province of Newfoundland and Labrador, this 7th day of March, 2016.



Thomas Johnson, Q.C.

Consumer Advocate

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