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May 27, 2016

Paul L. Coxworthy
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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: NLH - 2016 Capital Budget Supplemental Application - Gas Generator Engine
Refurbishments at Hardwoods and Stephenville**

Please find enclosed the original and eight (8) copies of the Requests for Information IC–NLH–1
to IC–NLH–9 of the Island Industrial Customers in the above Application.

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

Yours truly,

Stewart McKelvey

Paul L. Coxworthy

PLC/kmcd

Enclosure

- c. Geoffrey P. Young, Senior Legal Counsel, Newfoundland and Labrador Hydro
- Thomas J. Johnson, Consumer Advocate
- Gerard Hayes, Newfoundland Power
- Thomas J. O'Reilly Q.C., Cox & Palmer
- Dean A. Porter, Poole Althouse
- Sheryl Nisenbaum, Praxair Canada Inc.

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 (Hydro) pursuant to Subsection 41(3) of the *Act*, for approval of Gas Generator Engine Refurbishments at the Hardwoods and Stephenville Gas Turbine Plants


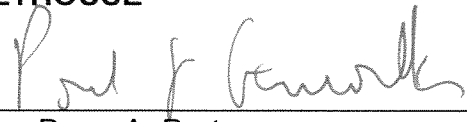
**ISLAND INDUSTRIAL CUSTOMERS GROUP
REQUESTS FOR INFORMATION
IC-NLH-1 to IC-NLH-9**

Issued: May 26, 2016

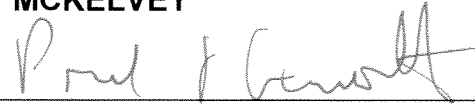
- 1 **IC-NLH-5** Please provide copies of all reports, assessments and
2 analyses, whether generated by Hydro internally or
3 commissioned by Hydro from an external source, which
4 consider or discuss the options for decommissioning or
5 replacement of the Hardwoods Gas Turbine plant and
6 Stephenville Gas Turbine plant.
- 7 **IC-NLH-6** Please provide copies of all reports, assessments and
8 analyses, whether generated by Hydro internally or
9 commissioned by Hydro from an external source, which
10 consider or discuss the future capital expenditures (ie
11 additional to those applied for in the present Application)
12 planned or anticipated as necessary or prudent to continue
13 operation of the Hardwoods Gas Turbine plant to its planned
14 or anticipated decommissioning as a thermal generation
15 source, and provide updated estimates for those planned or
16 anticipated future capital expenditures.
- 17 **IC-NLH-7** Please provide copies of all reports, assessments and
18 analyses, whether generated by Hydro internally or
19 commissioned by Hydro from an external source, which
20 consider or discuss the future capital expenditures planned
21 or anticipated as necessary or prudent to continue operation
22 of the Stephenville Gas Turbine plant to its planned or
23 anticipated decommissioning as a thermal generation
24 source, and provide updated estimates for those planned or
25 anticipated future capital expenditures.
- 26 **IC-NLH-8** With reference to the criteria to be provided in response to
27 IC-NLH-1 and IC-NLH-2, has Hydro established benchmark
28 or target future performance and reliability criteria for the
29 Hardwoods Gas Turbine and Stephenville Gas Turbine, for
30 the period from 2015 to their respective planned or
31 anticipated decommissioning as a thermal generation
32 source?
- 33 **IC-NLH-9** Please provide the estimated incremental fuel and O&M cost
34 to Hydro customers of power generated by the Hardwoods
35 Gas Turbine and Stephenville Gas Turbine as compared to
36 cost to Hydro customers of power generated by respectively
37 the Holyrood thermal generation plant and the 100 MW
38 Combustion Turbine plant. Please also provide the
39 estimated full revenue requirement for each plant in terms of
40 return on rate base, depreciation, and fixed O&M, including
41 the impact of the respective total capital expenditures on
42 each for the period 2008-2015 are taken into account in the
43 rates charged to Hydro customers.

DATED at St. John's, in the Province of Newfoundland and Labrador, this 27th day of May, 2016.

POOLE ALTHOUSE

 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: Praxair Canada Inc.
1 City Centre Drive, Suite 1200
Mississauga ON M5E 1M2

Attention: Sheryl Nisenbaum, Director of Legal Affairs