Reference from the Lieutenant-Governor in Council On the Muskrat Falls Project (the "Muskrat Falls Review")

REQUESTS FOR INFORMATION

1	RESPONSES TO RFIS		
2 3 4 5 6	PUB-Nalcor-91	Further to the response to MHI-Nalcor-2, please provide the individual CPW results for each of the Interconnected Scenario and the Isolated Island Scenario.	
7 8 9 10 11 12 13 14 15 16 17 18	PUB-Nalcor-92	The response to MHI-Nalcor-3 states that the option of accessing Churchill Falls power in 2041 was screened out as a viable option due to a number of issues including security of supply and reliability. It is stated on p. 1 in lines 19-22 that it is difficult to determine the environmental and policy frameworks that will be in place in 2041 and that there are other issues surrounding the Churchill Falls asset with respect to Hydro Quebec. The response to MHI-Nalcor-99 confirms that in the analysis for the power purchased expense for the Infeed Option, energy was assumed to be sourced from Churchill Falls for the period 2057 to 2067 while the response to MHI-Nalcor-49.2 provides that the price for such energy during that period is the price paid by Hydro Quebec under the Power Contract with CF(L)Co. In the response to MHI-Nalcor-3, p. 2 lines 18-19 it is stated that the risks and uncertainties associated with the option of accessing Churchill Falls power in 2041 are not present in the Interconnected scenario.	
21 22 23 24 25 26 27		These responses appear to provide conflicting information. Explain how the issues of security and reliability referred to in the response to MHI-Nalcor-3 do not apply to accessing Churchill Falls power in the period 2057 to 2067 and how the statement on lines 18-19 on p. 2 of the MHI-Nalcor-3 is correct.	
28 29 30 31 32 33 34	PUB-Nalcor-93	Explain why accessing Churchill Falls power for the period 2057-2067, as evidenced in the responses to MHI-Nalcor-49.2 and MHI-Nalcor-99, is a valid assumption for the Infeed scenario but it is not appropriate to use Churchill Falls power from 2041 as stated in the response to MHI-Nalcor-3 due to security and reliability issues as a viable option for the supply of power for the Isolated Island scenario.	
35 36 37 38	PUB-Nalcor-94	The response to MHI-Nalcor-9 states that in the Isolated Island Option no analysis has been done related to the operation of the Holyrood Thermal Plant and the response to MHI-Nalcor-3 states that there are risks	

1 associated with life extension measures for the Plant. If no analysis has 2 been completed on the life extension measures and costs associated with 3 the Plant what is the support for the statement that there are risks associated with life extension? 4 5 6 In the responses to MHI-Nalcor-3, p.3, it is stated that the option of PUB-Nalcor-95 7 accessing Churchill Falls power in 2041 introduces other economic 8 disadvantages as value is lost through the deferral of monetization of the Province's energy warehouse and the economic and employment benefits 9 from energy construction projects are foregone for decades. Is it correct 10 that this assumes that there will be no other Lower Churchill 11 developments for sales of power and energy outside the Province prior to 12 2041? 13 14 15 16 EXHIBIT 101 - INDEPENDENT SUPPLY DECISION REVIEW BY NAVIGANT **CONSULTING LTD. ("NAVIGANT")** 17 18 19 When was Navigant engaged by Nalcor to complete this review? PUB-Nalcor-96 20 21 Please identify the key personnel by focus area who conducted the review PUB-Nalcor-97 by Navigant and provide their CVs. 22 23 24 Please provide the total person hours spent by the key Navigant personnel PUB-Nalcor-98 25 in completing its review and provide a breakdown of the hours spent by 26 each key person. 27 28 **PUB-Nalcor-99** Describe the process followed by Navigant in completing Exhibit 101 and 29 include in the reply the total hours spent by Navigant in each of: (i) reviewing Nalcor produced documentation; (ii) meetings or interviews 30 with Nalcor personnel and (iii) completing its own analysis. 31 32 Did Navigant perform any other work or analysis for Nalcor or any of its 33 PUB-Nalcor-100 subsidiaries or associated companies prior to its engagement for the 34 Independent Supply Decision Review? If yes, provide details. 35 36 37 PUB-Nalcor-101 On p. 2 of Exhibit 101, Navigant's disclaimer states that the report was 38 prepared based on information provided by Nalcor and other sources. What other sources provided information and what information was 39 40 provided by each source? 41 42 PUB-Nalcor-102 On p. 13 of Exhibit 101, key finding 38 states: "Relative to the Isolated Island alternative, the Interconnected Island alternative is also expected to 43 provide similar levels of security and reliability, significantly reduced 44 GHG emissions and significantly less risk and uncertainty." Please 45 describe in detail how these "similar levels of security and reliability" 46

were determined for both options. Was a quantitative assessment of each 1 option completed for comparative purposes? If so, please provide a copy 2 3 of the assessment. 4 5 On p. 19 of Exhibit 101, Section 1.2 states: "The outcome of the PUB-Nalcor 103 6 generation planning analysis is a metric called Cumulative Present Worth (CPW), which is the present value of all incremental utility capital and 7 operating costs incurred by the utility to reliably meet a specific load 8 forecast given a prescribed set of reliability criteria." Specifically, what 9 was the "prescribed set of reliability criteria" assessed by Navigant as part 10 of its review of both Interconnected Island and Isolated Island Options? 11 12 On p. 23 of Exhibit 101, one of the key findings is that the level and 13 PUB-Nalcor-104 accuracy of information used in Nalcor's DG2 Island Supply Decision was 14 appropriate for the decision stage. Explain in detail the information relied 15 on to reach this conclusion. 16 17 On p. 23 of Exhibit 101, it is stated that Nalcor asked Navigant to provide 18 PUB-Nalcor-105 an opinion on whether current information impacts the reasonableness of 19 the DG2 decision. What information did Nalcor give Navigant to review 20 21 to allow such an opinion to be provided? 22 23 On p. 25 of Exhibit 101, it is stated: "As the Island requirements represent **PUB-Nalcor 106** 24 a much lower proportion of the Gull Island output and in the absence of confirmed export transmission via Quebec or new, large industrial load in 25 Labrador, the financial returns for the Gull Island project selling only to 26 27 the Island would be unacceptably low and the project would likely not be supported in capital markets. In order to provide the same rate of return 28 as projected for the Muskrat Falls project in the DG2 decision, the 29 purchase price for power from Gull Island would have to be 30 approximately 60 percent higher than power from Muskrat Falls." Would 31 the addition of a new, large industrial load on the Island or in Labrador 32 potentially impact the analysis of the preferred supply option? 33 34 Further to Exhibit 101, p. 25 referred to in PUB-Nalcor 106, what are the **PUB-Nalcor 107** 35 estimated average energy costs in 2010 \$/MWh, at the busbar, for each of 36 the Muskrat Falls and the Gull Island developments. 37 38 On p. 32 of Exhibit 101, Navigant states as a key finding that additional 39 **PUB-Nalcor 108** wind power could be considered in the Isolated Island alternative, 40 provided power system constraints identified in the 2004 wind integration. 41 study can be addressed cost effectively. Has Nalcor or Navigant studied 42 how the power system constraints could be addressed and at what cost? If 43 yes, please provide copies of the studies completed. 44

1 On p. 49 of Exhibit 101, Navigant states as a key finding that the PUB-Nalcor 109 2 estimated capital costs and escalation methodology for the various supply What information was provided by Nalcor options were reasonable. 3 and/or relied on by Navigant to allow it to reach this conclusion? For 4 5 example, was a detailed cost estimate report(s) on Muskrat Falls and the Labrador Island Link provided to Navigant? 6 7 8 Further to PUB-Nalcor-109, did Navigant complete an independent PUB-Nalcor 110 analysis relating to the capital costs for the various supply options? If yes, 9 provide details of the analysis completed. 10 11 On p. 55 of Exhibit 101, a table is provided of the Forced Outage Rates 12 **PUB-Nalcor 111** ("FOR") used by Nalcor in its analysis. Key finding 29 on p. 55 states: 13 14 "The...outage rates used by Nalcor in its analysis of the generation expansion alternatives were reasonable." How did Navigant determine 15 that a FOR for LIL of .89% was reasonable? 16 17 On p. 58 of Exhibit 101, it is stated that Navigant understands that Nalcor 18 **PUB-Nalcor 112** will be undertaking further work to further define the factors affecting the 19 power purchase price for Muskrat Falls Energy and the "degree of 20 volumetric flexibility". Specifically, what work is Nalcor undertaking on 21 this issue and what does "degree of volumetric flexibility" mean in this 22 23 context? 24 Did Navigant or Nalcor determine the sensitivity analyses to be 25 **PUB-Nalcor 113** completed, as outlined in Section 5 of Exhibit 101? Were other 26 sensitivities completed by either Navigant or Nalcor that are not outlined 27 in Section 5? If yes, please provide them. 28 29 On p. 69 of Exhibit 101, Generation Expansion Variants, Table 15, it is 30 PUB-Nalcor-114 stated that for two of the variants (the first and third), Nalcor assumed an 31 early replacement of the Holyrood facility in 2017 with a CCCT. What 32 was the rationale for this assumption on this early retirement date? 33 34 35 PUB-Nalcor-115 On page 70 of Exhibit 101, Section 5.2.1, Security of Supply and Reliability, it states "Nalcor has investigated the level of exposure and 36 unserved energy due to transmission failures in both alternatives. Based 37 38 on the Nalcor analysis, in the worst case scenarios (transmission failures occurring in the worst two week window in terms of system load and 39 available generation) both alternatives yield unsupplied energy of less 40 than I percent of the annual energy forecast which represents increased 41 security of supply and reliability as compared to the current situation. 42 Further, with inclusion of the Maritime Link to the Interconnected Island 43

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alternative, the security of supply and reliability for this alternative will be

substantially improved." Please provide a copy of Nalcor's analysis and

describe in detail what process Navigant followed to confirm the results of

Nalcor's analysis. As a result of Nalcor's analysis, what was the percent 1 unsupplied energy under the "current situation" and for each of the 2 Interconnected Island and Isolated Island options? 3 4 5 Further to PUB-Nalcor-115 reference is made to a "worst case" scenario PUB-Nalcor-116 in the quote from the report. Did Navigant or Nalcor determine this 6 7 scenario and how was it determined to be appropriate? 8 9 PUB-Nalcor-117 Further to PUB-Nalcor-115, what analysis of the Maritime Link did Navigant complete to allow them to conclude that the Maritime Link 10 would "substantially improve" the security of supply and reliability of the 11 Interconnected Island alternative? Please provide a copy of this analysis. 12 13 14 15 GENERAL OR OTHER 16 Provide a sensitivity analysis assuming the capital costs of the Muskrat 17 PUB-Nalcor-118 Falls facilities and the HVdc Labrador-Island Link facilities are increased 18 by 50% each and compare this sensitivity to the Isolated Island and 19 20 Labrador Interconnected base cases. 21 22 PUB-Nalcor-119 Further to PUB-Nalcor-7, PUB-Nalcor-8 and PUB-Nalcor-9, what other financial commitments have been made, or are anticipated to be made, 23 from August 1, 2011 to the planned date of project sanction, i.e. passing 24 through DG3? Please provide a detailed list of all such commitments, e.g. 25 studies, testing, construction, etc., their individual anticipated costs and 26 schedule for completion. 27 28 29 PUB-Nalcor-120 Please provide a high resolution electronic version of the latest up-to-date "Provincial Generation and Transmission Grid" graphic as depicted on p. 30 17 of Exhibit 101. 31 32 33 PUB-Nalcor-121 What are the annual power and energy requirements of each industrial customer of Newfoundland Hydro? 34 35 36 PUB-Nalcor-122 What is the annual capacity and energy capability of each industrial customer that has its own generation? 37 38 39 PUB-Nalcor-123 With reference to Exhibit 68; Air Emission Controls Assessment -Holyrood Thermal Generating Station - Final Report p. 31 has four 40 recommendations. The first recommendation is as follows: "adopt the 41 use of fuel oils with one percent sulphur content. This would achieve the 42 objective of a 50 percent reduction in SO₂ emissions using the least cost 43 option as determined by a Net Present Worth analysis as presented in 44 45 Appendix B." With Nalcor's switch to 0.7% sulphur No. 6 fuel at Holyrood, have the emission targets identified in the study been met? 46

1 2 3 4 5	PUB-Nalcor-124	Further to PUB-Nalcor-123, the final three recommendations on p. 31 of Exhibit 68 involve follow-up work to be completed by Nalcor. Please describe the specific activities undertaken by Nalcor for each of these recommendations and the individual results realized.
6 7 8 9	PUB-Nalcor-125	Please provide a copy of the Provincial Certificate of Approval currently governing the operation of the Holyrood Thermal Generating Station. Is the Holyrood Thermal Generating Station currently operating within the guidelines of this Certificate of Approval?
11 12 13 14 15 16 17 18 19 20 21 22	PUB-Nalcor-126	With Reference to Exhibit 44, Holyrood Thermal Generating Station — Condition Assessment and Life Extension Study p. 6 of 725, Section Overall Plant Assessment states: "Holyrood is also expected to be able to meet its 2041 end of life date for operation in a synchronous condensing mode, but will require some further substantial equipment refurbishments and replacements specific to that role. These are identified later in the report, but examples of these would include generator rewinds, powerhouse and pump house roof replacements, switching yard breakers and motorized switches refurbishments/replacements, and synchronous condensing conversions." Have the costs of these refurbishments and replacements been included in the CPW analysis?
23 24 25 26	PUB-Nalcor-127	Further to PUB-Nalcor-126, with the retirement of these synchronous condensers in 2041, what additional equipment will be added to the system to provide the necessary reactive power requirements?
27 28	PUB-Nalcor-128	Further to PUB-Nalcor-126, have the costs of these additions been included in the CPW analysis?

DATED at St. John's, Newfoundland this 6 day of October, 2011.

BOARD OF COMMISSIONERS OF PUBLIC UTILITIES

Chervl Blundon

Board Secretary