**IN THE MATTER OF** the *Public Utilities Act*, R.S.N.L., c.P-47 (the "Act"); and

IN THE MATTER OF an Application by Newfoundland and Labrador Hydro for an Order approving: (1) its 2012 capital budget pursuant to s. 41(1) of the Act; (2) its 2012 capital purchases, and construction projects in excess of \$50,000 pursuant to s. 41 (3) (a) of the Act; (3) its leases in excess of \$5,000 pursuant to s. 41 (3) (b) of the Act; and (4) its estimated contributions in aid of construction for 2012 pursuant to s. 41 (5) of the Act and for an Order pursuant to s. 78 of the Act fixing and determining its average rate base for 2010.

To: Board of Commissioners of Public Utilities

Suite E210, Prince Charles Building 120 Torbay Road P.O. Box 12040 St. John's, NL A1A 5B2

Attention: Ms. G. Cheryl Blundon,

Director of Corporate Services and Board Secretary

P2-CA-NLH-31

At the Technical Conference held on October 13, 2011, the presentation referred to the establishment of an Employee Liaison Advisory Committee (ELAC). Please provide copies of the Minutes of ELAC for 2010 and 2011 to date.

- P2-CA-NLH-32 Please indicate what commitments Hydro has made to existing Holyrood staff in terms of future employment with Hydro in the event of the Labrador infeed coming on line.
- P2-CA-NLH-33 According to p. 15 of the Install Operator Training Simulator Holyrood project at Tab 5, there are presently 28 operators at Holyrood. Please outline:
  - (a) the years of experience of each operator;
  - (b) the number of plant operators who are considered by Hydro to be fully trained;
  - (c) the number of trainees presently employed;
  - (d) the number of operators who have the experience and training to be considered as candidates for the position of Lead Plant Operator now;
  - (e) the number of operators who would qualify in each of the years 2012 to 2017 inclusive to be lead operators.
- P2-CA-NLH-34 What training and experience is necessary to become a fully trained plant operator and a lead operator respectively.
- P2-CA-NLH-35 Has Nalcor been advised by any of its present complement of operators that he or she would not be interested in continuing to work at Holyrood as an operator once the facility goes into either back-up or synchronous condensing mode?

P2-CA-NLH-36 Describe how Hydro will go about training its operators in the event that this Operator Training Simulator project is not approved by the Board and explain how, if at all, the training will differ from the training offered when Holyrood's future as a generating facility was not in question.

P2-CA-NLH-37 How do the wages and benefits of a Plant Operator at Holyrood compare to other wage and benefit opportunities within the Province of Newfoundland and Labrador.

P2-CA-NLH-38 How many persons with credentials sufficient to join Hydro as a plant operator graduate from Newfoundland and Labrador post secondary colleges on an annual basis.

P2-CA-NLH-39 Over each of the last 3 years, how many plant operator graduates have applied to work with Hydro and in how many instances has Hydro extended offers of employment and how many offers were accepted?

P2-CA-NLH-40 Describe the Ticket regime for thermal plant operators in this province.

P2-CA-NLH-41 What facilities in the province besides Holyrood, if any, provide an operator with the opportunity to obtain a first class ticket.

P2-CA-NLH-42

At paragraph 14 of the "Holyrood Condition Assessment Technical Conference" document dated October 13, 2011, there is a "Thermal Operation Chart" wherein the 28 operators are listed, including three (3) Lead Thermal Plant Operators. Please indicate the present level of qualifications of each of the Thermal Plant Operators.

P2-CA-NLH-43

Referring to the same document in the previous question, as of June 3, 2011, there are three (3) vacant positions outlined; one (1) in the Thermal Plant Operator section and two (2) in the Lead Thermal Plant Operator section. How long have these positions been vacant and explain the reason(s) for the vacancy. What steps are Hydro taking to fill these vacancies?

P2-CA-NLH-44

How many of the Thermal Plant Operators listed at page 14 of the Holyrood Condition Assessment Technical Conference document are deemed fully trained and able to operate the Holyrood Plant in synchronous condensing mode?

## Marine Terminal Refurbishment

P2-CA-NLH-45

Given the entire Marine Terminal at Holyrood will be decommissioned after 2020, please prioritize all refurbishments in terms of criticality as set out in the Project Description at page 5 of Tab 3.

P2-CA-NLH-46

Please specify the expenditures in the "Replace Fuel Oil Heat Tracing Project" which could have been avoided had Hydro not made the error referred to in P2-IC-NLH-32.

P2-CA-NLH-47

In reply to P2-PUB-NLH-46, Hydro states that after the order had been placed for the HDPE jacket cable, Tyco informed Hydro that the new Electric Heat Tracing cable scheduled to be installed would be running at higher than allowable sheath temperature due to part of the circuit being bypassed by tech cables. Hydro then states that it was asked by Tyco to reduce voltage by ten percent in order to address the jacket heating issue. Please provide a copy of these communications between Tyco and Hydro.

P2-CA-NLH-48

Further to the previous question, did Hydro reduce voltage by ten percent order to address the jacket heating issue. If it did, why has not Hydro made a claim against Tyco in respect of this advice? If Hydro did not reduce voltage as directed, why did it not do so?

P2-CA-NLH-49

At p. C-4 it stated that: the "Plant decided to have the copper sheathed heater cables to be jacketed with HI Density Polyethylene to protect the copper sheath from corrosion. The maximum allowable wattage for HI Density Polyethylene jacketed heater cable is 8 watts per foot. Hydro did not change the heater cable length to suit the lowered wattage loading." Why not and what was the result of that decision?

P2-CA-NLH-50 On what basis does Hydro contend that Hydro's customers should be put to the expense of this project in light of Hydro's error.

**DATED** at St. John's, in the Province of Newfoundland and Labrador, this day of October, 2011.

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