

**IN THE MATTER OF** the Public Utilities Act  
(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 \$50,000.00 pursuant to s. 41(3)(a) of  
the Act; (3) its leases in excess of \$5,000.00  
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

**REQUESTS FOR INFORMATION OF THE ISLAND INDUSTRIAL CUSTOMERS (Phase II –  
Holyrood Projects - Post Technical Conference)**

**P2-IC-NLH-48** With reference the Operator Training Simulator (OTS) Project, if  
this Project is approved by the Board by January 2012, when will  
the Project commence and when will the OTS be in operation and  
in use?

**P2-IC-NLH-49** With reference to Hydro's response to P2-IC-NLH-37, how many  
of the 5 existing employees in the "Lead Thermal Plant Operator"  
classification will be eligible for retirement before 2017? Before  
2021?

**P2-IC-NLH-50** With reference to Hydro's response to P2-IC-NLH-37, how many  
of the 20 existing employees in the "Thermal Plant Operator"  
classification will be eligible for retirement before 2017? Before  
2021?

**P2-IC-NLH-51** How long, using training procedures available to Hydro without  
OTS, would it take to train any of the 20 existing employees in the  
"Thermal Plant Operator" classification to upgrade him or her to  
the "Lead Thermal Plant Operator" classification? If, in answering  
the foregoing question, Hydro identifies there is a range of time  
necessary dependent on the years of experience of each  
employee, please identify the training time period applicable to  
each employee based on their current years of experience.

**P2-IC-NLH-52** Provide the same information as requested by P2-IC-NLH-51, but  
assuming OTS is operational and starting from the date OTS is  
expected to be operational (per P2-IC-NLH-48).

**P2-IC-NLH-53**

Has Hydro identified any current employees in other Trade Classifications, whose experience would shorten the training period to "Thermal Plant Operator" (with or without OTS), as compared to a person with no applicable experience? If no, why not? If yes, identify

(a) How many will be eligible for retirement before 2017? Before 2021?

(b) The training time period applicable to each such employee based on their current years of experience to upgrade him or her to the "Thermal Plant Operator" classification without OTS? With OTS, assuming OTS is operational and starting from the date OTS is expected to be operational (per P2-IC-NLH-48)?

**P2-IC-NLH-54**

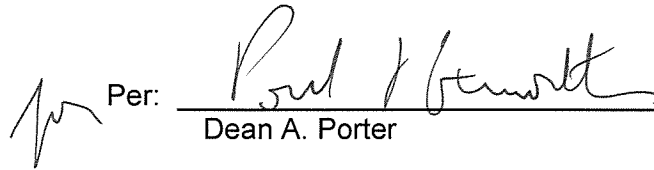
With reference to the October 13, 2011 Technical Conference, does Hydro expect to have to train persons without any applicable experience to fill "Thermal Plant Operator" classification positions (ie persons who would not meet the criteria set out on P2-IC-NLH-53) before 2017? before 2021? If yes, what would be the training time period applicable to each such person to upgrade him or her to the "Thermal Plant Operator" classification without OTS? With OTS, assuming OTS is operational and starting from the date OTS is expected to be operational (per P2-IC-NLH-48)?

**P3-IC-NLH-55**

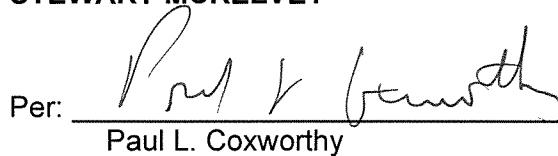
With reference to the AMEC handout at the October 13, 2011 Technical Conference, at page 25, AMEC outlines its "Priority Assessment" methodology. Is there any aspect of this methodology which is inconsistent with Hydro's methodology for ranking of capital projects in this Capital Budget Application? Are there considerations in Hydro's methodology which are not included in AMEC's methodology as outlined on page 25? If Hydro's answer to either of the foregoing questions is "yes", please identify and provide the rationale for the difference or differences between AMEC's methodology and Hydro's?

**DATED** at St. John's, this 21<sup>st</sup> day of October, 2011.

**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, 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