IN THE MATTER OF the *Electrical Power Control Act*, RSNL 1994, Chapter E-5.1 (the "EPCA") and the *Public Utilities Act*, RSNL 1990, Chapter P-47 (the "Act") as amended, and their subordinate regulations; and

IN THE MATTER OF an Application by Newfoundland and Labrador Hydro pursuant to Subsection 41(3) of the Act, for the approval to upgrade Unit 1 stack breeching and to upgrade the fuel oil storage facility at the Holyrood Thermal Generation Station.

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

CONSUMER ADVOCATE'S INFORMATION REQUESTS
CA-NLH-01 - CA-NLH-22

CA-NLH-01 Why didn't Hydro seek approval of the Refurbishment of the Fuel Oil Storage Facility and the Upgrade Unit 1 Stack Breeching as part of its 2012 Capital Budget Application?

CA-NLH-02 Does Hydro agree that the Board should evaluate these projects in the context of Hydro's other Holyrood-related projects in its 2012 Capital Budget

Application?

CA-NLH-03 In its November 14, 2008 submissions to the Board, Hydro acknowledged (p. 3, lines 10-11):

The choice and consideration of projects for the Holyrood Thermal Generating Station poses a particularly difficult challenge." Given this difficulty, would a Technical Conference to consider Holyrood related projects in the context of the Holyrood Condition Assessment and Life Extension Study and the impending final sanction decision, be advisable?

CA-NLH-04 Re: Refurbishment of the Fuel Oil Storage Facility

Please provide comparison of the costs for the manual fuel reconciliations versus the fuel oil level indication system (at $190,000.00) outlined at page 3.

CA-NLH-05 Re: Refurbishment of the Fuel Oil Storage Facility

Is the manual fuel reconciliations part of the ongoing daily maintenance required at the Holyrood Thermal Generating Station?

CA-NLH-06 Re: Refurbishment of the Fuel Oil Storage Facility

At Appendix A, page 10, an external inspection was recommended to be completed in 2008. Has the subsequent inspection been completed?

CA-NLH-07 Re: Holyrood: Upgrade Unit 1 Stack Breeching

With respect to the Project Description at p. 2 of the July 2011 report to the Board, can Hydro please clarify whether Hydro proposes to replace the East Support Structure as well as the West Support Structure?

CA-NLH-08 Re: Holyrood: Upgrade Unit 1 Stack Breeching

Please indicate whether with respect to the proposed work in relation to the support structures, Hydro is deviating from the recommendations in the Hatch report of January 26, 2011 at p. 2 thereof, found at Appendix "C".

CA-NLH-09 Re: Holyrood: Upgrade Unit 1 Stack Breeching

With respect to the budget Estimate at Section 5.1, please break out the project costs for each element or aspect of the work which Hydro is proposing to undertake in this overall project, eg. refurbishing steel casing, work on East Support Structure, work on West Support Structure, insulation of breeching externally, ice protection shelters, etc.

CA-NLH-10 Re: Holyrood: Upgrade Unit 1 Stack Breeching

With respect to the aspect of the Project that is comprised of "insulating the breeching externally complete with water tight cladding and flashing", was this the 'long term solution' that the Board refers to at p. 10, lines 29 - 31 of P.U. No. 38 (2010)?

CA-NLH-11 Re: Holyrood: Upgrade Unit 1 Stack Breeching

With respect to the Board's statement in P.U. No. 38 (2010) at p. 10, "Hydro has not shown, however, that the 'long term' solution is appropriate in the circumstances. Hydro has not shown that insulation problems have a reasonable or any potential to cause the worst case scenario of a forced outage." Where, specifically, in the materials filed in support of this present Application does Hydro show that insulation problems have a reasonable or any potential to cause the worst case scenario of a forced outage?

CA-NLH-12 Re: Holyrood: Upgrade Unit 1 Stack Breeching

At page 10 of PU No 38 (2010), the board stated at p. 10, "It would appear based on the evidence, that the main reason for the proposal to add external insulation is the maintenance costs associated with the existing internal insulation. The Board notes the high maintenance costs associated with the internal insulation but, given the recent decision to proceed with the Labrador infeed and the switch to low sulfur fuel, it would appear to be prudent to maintain the existing insulation at this time and assess the maintenance costs against the significant immediate capital costs of installing external installation and ice protection." What are the projected costs of installing external insulation and ice protection in this application?

CA-NLH-13 Re: Holyrood: Upgrade Unit 1 Stack Breeching

What is the type of maintenance in Alternative 3 that is assumed to be needed if the work described in that alterative were undertaken, which is assumed or estimated to cost $49,391.00 per year?

CA-NLH-14 Re: Holyrood: Upgrade Unit 1 Stack Breeching

What corrective maintenance was needed for the Unit 1 stack breeching for 2007 to present, described by year (see Table 1: Maintenance History).

CA-NLH-15 Re: Holyrood: Upgrade Unit 1 Stack Breeching

Please confirm that Hydro's current base case is to operate Holyrood as a power source as needed through 2016 and as a back up with minimal operation from 2017 to 2020 and that by 2017 Hydro expects that annually it will consume in total 32,000 barrels of oil per year, as stated in the report

"Holyrood Thermal Generating Station Requirements 2011 to 2020" dated July 2011. Please explain why given the most recent base case it would not be prudent to maintain the existing insulation and to forego the installation of external insulation and ice protection.

CA-NLH-16 Re: Holyrood: Upgrade Unit 1 Stack Breeching

Given that the Hydro's most current base case is to operate Holyrood for the period 2017 to 2020 at just 32,000 barrels of oil per year, why is it stated in Section 4.3 (Cost Benefit Analysis) that the study period for the Cost Benefit Analysis was 9 years, this year period being described as the "minimum service life expected of the breeching system which is dependent on the future of Holyrood as a generating station."?

CA-NLH-17 Re: Holyrood: Upgrade Unit 1 Stack Breeching

Why is not the minimum service life of the breeching system, the period from present to 2016?

CA-NLH-18 Re: Refurbishment of the Fuel Oil Storage Facility

Given the base case for Holyrood, why is there a need for a Fuel Oil Level Indication System at a cost of $190,000.00 when according to the base case, by 2017 a total of 32,000 barrels of oil per annum are expected to be consumed at Holyrood?

CA-NLH-19 Re: Refurbishment of the Fuel Oil Storage Facility

Is Hydro able to have fuel delivered in a shorter period than 28 days from date of order?

CA-NLH-20 Re: Refurbishment of the Fuel Oil Storage Facility

Please provide a copy of Hydro's current fuel procurement and delivery contract(s) for Holyrood.

CA-NLH-21 Re: Refurbishment of the Fuel Oil Storage Facility

Under Hydro's contract with its fuel deliverer, can Hydro stipulate the size of the shipment of oil required , i.e. is there a minimum or maximum shipment size?

CA-NLH-22 Re: Refurbishment of the Fuel Oil Storage Facility

At p. 7, it states that the plant consumes approximately 17,000 barrels per day when operating at full load. What percentage of days over the period from 2002 to 2005 [i.e. January 1 to April 30] had consumption:

(a) at 17,000 barrels

(b) from 14,000 - 16,999 barrels

(c) from 10,000 - 13,999 barrels

(d) from 6,000 - 9,999 barrels

(e) from 3,000 - 5,999 barrels

(f) less than 3,000 barrels

DATED at St. John's, in the Province of Newfoundland and Labrador, this 15th day of August, 2011.

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