

Newfoundland and Labrador Hydro 2013 Amended General Rate Application

UNDERTAKINGS

Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
Transcript - September 10, 2015			
1	<p>Page 53, lines 7-17</p> <p><i>Re: Customer Satisfaction - Canadian Average</i></p> <p>Undertake to provide that data for the 55 percent figure.</p>	<p>NP Counsel Liam O'Brien to NLH Ed Martin</p>	<p>Response U#1 Filed: 2015-09-11</p>
2	<p>Page 100, lines 10-25 to Page 101 lines 1-12</p> <p><i>Re: Target/Performance Measures for Senior Positions</i></p> <p>(a) Undertake to provide targets that you use to hold your senior people accountable... what the targets, the performance measures re: financials, reliability, any indicia of performance. ...undertake to provide the targets that you have used in this regard for each of the last three years,</p> <p>(b) In addition, ...it would be useful -to -have a template produced as to how these measures figure into the compensation of Mr. Henderson who is running Hydro. ...how it's broken down, what's rewarded, what percentage was achieved, those types of things, for the last three years.</p>	<p>CA Thomas Johnson to NLH Ed Martin</p>	<p>See Response U#6 Filed: 2015-09-14</p> <p>Response U#2(b) 2013 Filed: 2015-09-14</p> <p>Response U#2(b) 2014 Filed: 2015-09-14</p>

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3	<p>Page 122, line 6 to Page 123, line 18</p> <p><i>Re: Performance contracts for senior management level reporting to Rob Henderson</i></p> <p>Undertake to provide performance contracts for the last two years.</p>	<p>CA Thomas Johnson to NLH Ed Martin</p>	<p>Response U#3(a) 2014 Filed: 2015-09-14</p> <p>Response U#3(b) 2015 Filed: 2015-09-14</p> <p>Response U#3(b) 2015 Rev 1 Filed: 2015-09-17</p>
4	<p>Page 139, lines 20-23</p> <p>Undertake to provide the budget guidelines that have been issued for '13, '14, and '15?</p>	<p>CA Thomas Johnson to NLH Ed Martin</p>	<p>Response U#4 Filed: 2015-09-14</p> <p>Response U#4 Rev 1 Filed: 2015-09-24</p>
Transcript - September 11, 2015			
5	<p>Page 13, lines 17-23</p> <p>(a) Undertake for Hydro to file the factors, the criteria or factors that were used to determine the amount of each incentive payment received (<i>for employees who received incentive payment related to 2014 performance?</i>)</p> <p>Page 22, lines 1- 9</p> <p>(b) Mr. Martin agreed to provide how many of the 21 eligible received monies in relation to asset management performance for 2014? (<i>Further to 2(a) September 11, 2015</i>)</p>	<p>CA Thomas Johnson to NLH Ed Martin</p>	<p>Response U#5(a) Filed: 2015-09-14</p> <p>Response U#5(b) Filed: 2015-09-14</p>

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6	Page 24, lines 7-14 Undertake to provide the performance targets for '13 and '14 and '15, ... how your results matched up with the targets	CA Thomas Johnson to NLH Ed Martin	Response U#6 Filed: 2015-09-14
7	Page 25, lines 1-5 Undertake to provide the ... performance contracts for the past two years for ...those for the leadership team more broadly (extension to Undertaking -3)	CA Thomas Johnson to NLH Ed Martin	See Responses Response U#3(a) 2013 Response U#3(b) 2014 Filed: 2015-09-14
Transcript - September 14, 2015			
8	Page 36, lines 4-6 to Page 35, lines 7-18 Undertake to provide - (a) When Hydro (Mr. Martin) became aware of the advertisement by ProEnergy Parts Solutions and CFAS Enterprises Inc? (b) Provide ... a copy of what information you did receive as a result of this advertisement, these two advertisements. (Copy of the information that comprised the advertisement).	Danny Dumaresque to NLH Ed Martin	Response U#8 and #9 Filed: 2015-09-21
9	Page 56, lines 15-19 Undertake to provide - When (Mr. Martin) was aware of the potential investigation of ProEnergy and what do you recall being told the investigation was about	Danny Dumaresque to NLH Ed Martin	Response U#8 and #9 Filed: 2015-09-21

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U Requests	Description	Requested By	Response
Transcript - September 16, 2015			
10	Page 5, lines 9-19 Undertake to provide - The 2015 measures and weightings that are in place for this year for Mr. Henderson. ...that would be the 2015 performance contracts without the outcomes	Board Hearing Counsel Maureen Green to NLH Ed Martin	Response U#10 Filed: 2015-09-22
11	Page 7, lines 8-16 Undertaking (a) Hydro (<i>to</i>) file the bonuses paid in 2015 related to 2014 performance for the positions that are shown on Information number 4... request with respect to the non-Hydro executives (b) So for the Nalcor ones, that the bonus would indicate any portion of the bonus paid to the Nalcor executives that in turn gets charged to Hydro.	Board Hearing Counsel Maureen Green to NLH Ed Martin	11(a) See Response U#3(b) 2015 Rev 1 Response 11(b) Filed: 2015-10-06
12	Page 91, lines 10-13 Undertake to provide a copy of those internal charts (<i>Internal Organizational Charts</i>).	NP Counsel Liam O'Brien to NLH Panel Gerard McDonald and Michael Roberts	Response U#12 Filed: 2015-09-21

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13	<p>Page 154, lines 17 to Page 155, line 2</p> <p>Undertake to provide a full copy of the Mercer Report found in RFI CA-NLH-266 (Attachment 1)</p>	<p>NP Counsel Liam O'Brien to NLH Panel Gerard McDonald and Michael Roberts</p>	<p>Response U#13 Filed: 2015-11-13</p>
14	<p>Page 158, lines 22-25</p> <p>Undertaking to check if there's any particular documents relied upon for the 2013/2015 forecast in relation to non-union compensation that's built into those revenue requirements.</p>	<p>NP Counsel Liam O'Brien to NLH Panel Gerard McDonald and Michael Roberts</p>	<p>Response to RFI PUB-NLH-029 responds to undertaking.</p>
Transcript - September 17, 2015			
15	<p>Page 28, line 24 to Page 29, line 6</p> <p>(a) Undertaking to provide... for 2013, 2014, and 2015 two things; first, the targets, objectives, and initiatives for those years;</p> <p>(b) Secondly, the specific divisional plan for each of those years.</p>	<p>CA Thomas Johnson to NLH Panel Gerard McDonald and Michael Roberts</p>	<p>Response U#15(a) and (b) Filed: 2015-09-24</p>

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16	<p>Page 33, lines 7-10</p> <p>If you want to undertake to provide the number of employees in Hydro in '06 and '07 ? <i>(2006 and 2007)</i></p>	<p>CA Thomas Johnson to NLH Panel Gerard McDonald and Michael Roberts</p>	<p>Response U#16 Filed: 2015-09-24</p>
17	<p>Page 39, lines 31-32</p> <p>Well, could you determine for us for those years what you charged into CF(L)Co for those two years? <i>(2006 and 2007)</i></p>	<p>CA Thomas Johnson to NLH Panel Gerard McDonald and Michael Roberts</p>	<p>Response U#17 Filed: 2015-10-05</p>
18	<p>Page 120,lines 7-14</p> <p>Undertake to provide the retirement allowance for Maritime Electric in 2007</p>	<p>CA Thomas Johnson to NLH Panel Gerard McDonald and Michael Roberts</p>	<p>Response U#18 Filed: 2015-09-21</p>
19	<p>Page 128, line 23 to Page 129, line 5</p> <p>Undertake to update Chart 2.3 using 2014 and 2015 hourly rates ... instead of using 2013 hourly rates, building in the allowances included in the CLRA rate into the Hydro rates? <i>(...Two elements here? One is the updating and the other is the sort of realignment with relation to the other costs.... for 2014 and 2015)</i></p>	<p>CA Thomas Johnson to NLH Panel Gerard McDonald and Michael Roberts</p>	<p>Response U#19 Filed: 2015-10-19</p>

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U Requests	Description	Requested By	Response
20	<p>Page 133, lines 5-14</p> <p><i>Re: (CA-NLH-358)</i></p> <p>.... Undertaking to ...add another column just showing Newfoundland Power.</p>	<p>CA Thomas Johnson to NLH Panel Gerard McDonald and Michael Roberts</p>	<p>Response U#20 Filed: 2015-09-22 (previously filed as U#17 in error)</p> <p>Response U#20 Rev 1 Filed: 2015-10-19</p>
21	<p>Page 140, lines 9-14</p> <p>Undertake to provide the average weekly earnings one can be found on the Government of Newfoundland and Labrador's website.</p>	<p>CA Thomas Johnson to NLH Panel Gerard McDonald and Michael Roberts</p>	<p>Response U#21 Filed: 2015-09-22</p>
22	<p>Page 158, lines 13-16</p> <p><i>Re: Table 3.14</i></p> <p>An undertaking for inquiries to be made to the Finance Department to see if there is such a similar template <i>made available to Nalcor employees</i> either in existence or under development? (inter-company costs)</p>	<p>IC Counsel Paul Coxworthy to NLH Panel Gerard McDonald and Michael Roberts</p>	<p>See Response U#25 Filed: 2015-09-24</p>
23	<p>Page 171, lines 6-8</p> <p>Undertaking to produce your list of 12 commonly used (work) codes?</p>	<p>IC Counsel Paul Coxworthy to NLH Panel Gerard McDonald and Michael Roberts</p>	<p>Response U#23 Filed: 2015-09-21</p>

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U Requests	Description	Requested By	Response
24	<p>Page 176, lines 21-23</p> <p>Undertaking to generate a number for 2012 and 2013... time that has been allocated, charged in specifically to Hydro for you from your docketed time for time that was charged in for all lines of business NOTE HYDRO TO TAKE UNDER ADVISEMENT AND DISCUSS WITH COUNSEL ON MONDAY SEPT 21</p>	<p>IC Counsel Paul Coxworthy to NLH Panel Gerard McDonald and Michael Roberts</p>	<p>Response U#24 Filed: 2015-09-30</p>
Transcript - September 21, 2015			
25	<p>Page 31, lines 17-23 and Page 32, lines 1-2</p> <p>Undertake to provide the guidelines (for recording timesheets)</p>	<p>Vale Counsel Thomas O'Reilly to NLH Panel Gerard McDonald and Michael Roberts</p>	<p>Response U#25 Filed: 2015-09-24</p>
26	<p>Page 105, lines 16-18</p> <p>Mr. McDonald offered to provide an undertaking to go back and check how the Asset management time was charged back in 2008.</p>	<p>Board Hearing Counsel Maureen Greene to NLH Panel Gerard McDonald and Michael Roberts</p>	<p>Response U#26 Filed: 2015-09-30</p>

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27	<p>Page 135, lines 19-21 to Page 136, lines 3-5</p> <p>Undertaking to provide the charts (<i>internal charts with dotted lines like Finance</i>) for the other divisions (<i>within Hydro</i>).</p>	<p>Board Hearing Counsel Maureen Greene to NLH Panel Gerard McDonald and Michael Roberts</p>	<p>Response U#27 Filed: 2015-11-06</p>
28	<p>Page 161, lines 18-21 to Page 164, lines 13-22</p> <p><i>Re: Performance Contracts for Senior Positions</i> <i>Re: Incentive Payments Related to 2014 Performance</i></p> <p>Undertaking to provide what percentage of the bonus was actually paid that relates to those numbers, reliability.... what is the total percentage of the bonus that was paid that relates to asset management and reliability for 2014...</p> <p>(<i>Further to 2(a) September 11, 2015 and 5(a) and (b) September 14, 2015</i>)</p>	<p>Board Hearing Counsel Maureen Greene to NLH Panel Gerard McDonald and Michael Roberts</p>	<p>Response U#28 Filed: 2015-10-07</p>
Transcript - September 22, 2015			
29	<p>Page 95, line 7 to Page 97, line 1</p> <p><i>Re: Discussion of reduction related to overtime from 2014 vs. 2015 test year - Mr. Henderson advised that the 3.4 million that Liberty had put forward was an incorrect number.</i></p> <p>Request to undertake to provide the correct number</p>	<p>NP Counsel Liam O'Brien to NLH Panel Robert Henderson Terry Gardiner Darren Moore</p>	<p>Response U#29 Filed: 2015-09-29</p>

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U Requests	Description	Requested By	Response
30	<p>Page 104, line 8 to Page 105, line 12</p> <p><i>Re: jump in 2014 in system equipment maintenance from 22 to 28 (million)?</i></p> <p>Undertaking to break down the reason for the increase from the 2014 forecast to the actual on that figure.</p>	<p>NP Counsel Liam O'Brien to NLH Panel Robert Henderson Terry Gardiner Darren Moore</p>	<p>Response U#30 Filed: 2015-09-29</p>
31	<p>Page 133, lines 17-25</p> <p><i>Re: FTE's included in test year</i></p> <p>Undertake to provide that confirmation that there an adjustment in the revenue requirement for 2015 for changes in FTE's in 2015?</p>	<p>NP Counsel Liam O'Brien to NLH Panel Robert Henderson Terry Gardiner Darren Moore</p>	<p>Response U#31 Filed: 2015-11-06</p>
32	<p>Page 181, line 22 to Page 183, line 3</p> <p><i>Re: Undertake to confirm the 63 million – is result of deferrals into 2015 of capital work</i></p> <p>...the difference in the 63 million ... apart from the CT, ...if there's a break-out in terms of how much is that a deferral into 2015 or even if there's any schedule in terms of that deferral or if it's work that's not going to be done.</p>	<p>NP Counsel Liam O'Brien to NLH Panel Robert Henderson Terry Gardiner Darren Moore</p>	<p>Response U#32 Filed: 2015-10-05</p>

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Transcript - September 23, 2015			
33	<p>Page 123, lines 8-15</p> <p><i>Re: Page 1.28 of Hydro's Evidence - Chart 1.13</i></p> <p>...given the position of Hydro that from '07 to 2013, the controllable costs were kept within inflation, I wonder would you undertake to provide the backup as to how that assertion was made, having regard to - how that assertion was made, and what was actually included in what you reported in Chart 1.13 in the company's evidence.</p>	<p>CA Thomas Johnson to NLH Panel Robert Henderson Terry Gardiner Darren Moore</p>	<p>Response U#33 Filed: 2015-09-29</p>
Transcript - September 24, 2015			
34	<p>Page 41, line 19 to Page 43, line 8</p> <p><i>Re: PUB-NLH-403</i> <i>Re: Response "this increase in O&M is primarily related to the cost Hydro will be required to pay CF(L)Co for maintenance of the TwinCo assets on the Labrador Island -- or the Labrador Interconnected System"</i></p> <p>Undertake to provide the basis for that reply in the sense that it was primarily related to those costs because those costs are 2.8 million, as I understand the previous discussion. So what's the explanation for the other 1.3 million of the overall 4.1 million increase?</p>	<p>CA Thomas Johnson to NLH Panel Robert Henderson Terry Gardiner Darren Moore</p>	<p>Response U#34 Filed: 2015-09-29</p>

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U Requests	Description	Requested By	Response
35	<p>Page 74, line 16 to Page 75, line13</p> <p><i>Re: Winter Readiness Report to be filed with the Board by September 30, 2015</i></p> <p>Undertake to file that report on the record in this proceeding once it's prepared.</p>	<p>CA Thomas Johnson to NLH Panel Robert Henderson Terry Gardiner Darren Moore</p>	<p>Response U#35 Filed: 2015-10-02</p>
36	<p>Page 90, lines 8 to 22</p> <p><i>Re: Rural deficit issues following the filing of the March 2003 report</i></p> <p>Undertake to check and advise if Hydro received any written comment from Government on the Rural Deficit Issues following the March 2003 report.</p>	<p>CA Thomas Johnson to NLH Panel Robert Henderson Terry Gardiner Darren Moore</p>	<p>Response U#36 Filed: 2015-09-30</p>
37	<p>Page 93, line 2 to Page 95, line 14</p> <p><i>Re: The accountability and responsibility of Hydro's leadership team, many of whom are non-Hydro employees, in regard to governance and decision making issues</i></p> <p>Undertake to advise us where the clarity is on the documentation on the record as to it being clear that these Nalcor employees have the responsibility and accountability...</p>	<p>CA Thomas Johnson to NLH Panel Robert Henderson Terry Gardiner Darren Moore</p>	<p>Response U#37 Filed: 2015-10-08</p>
38	<p>Page 114, line 9 to Page 115, line 14</p> <p><i>Re: Corner Brook Pulp and Paper water rights</i></p> <p>Undertake to provide... who is responsible for monitoring compliance of this agreement with Corner Brook Pulp and Paper's water rights, whether it's someone within Hydro or outside?</p>	<p>CA Thomas Johnson to NLH Panel Robert Henderson Terry Gardiner Darren Moore</p>	<p>Response U#38 Filed: 2015-09-30</p>

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U Requests	Description	Requested By	Response
39	<p>Page 126, line 21 to Page 128, line13</p> <p><i>Re: Frequency Converter</i></p> <p>Undertake to provide how much Corner Brook Pulp and Paper pays for demand and energy. And... compare...those costs to the costs included in the specifically assigned charge...</p>	<p>CA Thomas Johnson to NLH Panel Robert Henderson Terry Gardiner Darren Moore</p>	<p>Undertaking Withdrawn: 2015-09-28</p>
40	<p>Page 147, line 24 to Page 151, line 3</p> <p><i>Re: Joint Utilities Meetings</i></p> <p>Undertake to provide the minutes for the joint utilities meetings for the period 2005 to present, the last annual joint utilities meeting.</p>	<p>IC Counsel Paul Coxworthy to NLH Panel Robert Henderson Terry Gardiner Darren Moore</p>	<p>Response U#40 Filed: 2015-10-19</p>
Transcript - September 28, 2015			
41	<p>Page 66, line 13 to Page 68, line 13</p> <p><i>Re: Hydro's estimate as to what the difference would be in relation to demand and energy to reflect the loads of Vale and Praxair.</i></p> <p>Undertake to provide Hydro's analysis in relation to the increased load of Vale and Praxair.</p>	<p>CA Thomas Johnson to NLH Cost of Service Witness Robert Greneman</p>	<p>Response U#41 Filed: 2015-09-30</p>

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42	<p>Page 115, line 24 to Page 118, line 23</p> <p><i>Re: The amount of increase in return on rate base for Labrador Interconnected</i></p> <p>Undertake to provide how much of that increase can be attributed to the Labrador City distribution upgrade.</p>	<p>IN Counsel Senwung Luk to NLH Cost of Service Witness Robert Greneman</p>	<p>Response U#42 Filed: 2015-10-01</p>
Transcript - September 29, 2015			
43	<p>Page 174, line 4 to Page 176, line 11</p> <p><i>Re: PUB-NP-005, Table 2</i></p> <p>Undertake to provide the source/reference of gross cost of the average subsidy in dollars per customer per year.</p>	<p>IN Counsel Senwung Luk to NP Cost of Service Witness Larry Brockman</p>	<p>Source can be found in footnote 1 to PUB-NP-005.</p> <p>Addressed by Mr. Luk's re-examination of Mr. Raphals on September 30th, at page 1, line 22 to page 4, line 9 of the transcript</p>
Request for Undertaking - October 1, 2015			
44	<p>See Written Request for Undertaking – U-44</p>	<p>CA Thomas Johnson to NLH Re: Cost of Service</p>	<p>Response U#44 Filed: 2015-10-05</p> <p>Response U#44 Rev 1 Filed: 2015-10-06 (Note: Table 4 change)</p>

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U Requests	Description	Requested By	Response
Transcript - October 6, 2015			
45	<p>Page 24, line 5 to Page 27, line 14</p> <p><i>Re: IC Counsel rate phase-in</i></p> <p>Undertake to provide calculations supporting IC Counsel rates for January 1, 2016, and September 1, 2016.</p>	<p>CA Thomas Johnson to NLH Kevin Fagan</p>	<p>Response U#45 Filed: 2015-11-06</p>
45.1	<p>Transcript - October 7, 2015 Page 17, line 24 to Page 18, line 20</p> <p>Undertaking to illustrate cost of service/rate impact of reallocating \$600K of specifically assigned charges to common.</p>	<p>Provided by NLH Kevin Fagan</p>	<p>Response U#45.1 Filed: 2015-11-10</p> <p>Filed electronically only with parties due to size.</p>
46	<p>Page 84, line 8 to Page 89, line 8</p> <p><i>Re: Corner Brook Pulp and Paper co-generation costs</i></p> <p>Undertake to provide what portion, or how much in dollar terms, Newfoundland Power, Vale and North Atlantic will be paying based both on test year and the projected fuel price.</p>	<p>CA Thomas Johnson to NLH Kevin Fagan</p>	<p>Response U#46 Filed: 2015-10-16</p>

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46.1	<p>Page 56, lines 3-11</p> <p><i>Re: Rural Deficit</i></p> <p>Undertake to provide an updated 2016/2017 forecast for the Rural Deficit if (Hydro) makes changes only for the fuel price forecast.</p>	<p>CA Thomas Johnson to NLH Kevin Fagan</p>	<p>Response U#46.1 Filed: 2015-10-19</p>
Transcript - October 8, 2015			
47	<p>Page 166, lines 12-15</p> <p>Undertake to provide any communications pertaining to the OM & A (any estimates that were provided to Vale.. any requests that Vale had sought in relation to OM & A estimates).</p>	<p>CA Thomas Johnson to NLH Panel Robert Henderson Terry Gardiner Darren Moore</p>	<p>Response U#47 Filed: 2015-10-22</p>
48	<p>Page 170, lines 13-21</p> <p>Undertake to advise...if (VALE) paid for all of what's been specifically assigned to them, and if not, who ended up paying for it (in terms of whatever was constructed now, whatever was constructed and is now considered a specifically assigned asset of VALE).</p>	<p>CA Thomas Johnson to NLH Panel Robert Henderson Terry Gardiner Darren Moore</p>	<p>Response U#48 Filed: 2015-10-29</p>

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49	<p>Page 171, line 25 to Page 172, line 1</p> <p>Undertake to provide (the signatories) who signed the power service agreement on behalf of Vale.</p>	<p>CA Thomas Johnson to NLH Panel Robert Henderson Terry Gardiner Darren Moore</p>	<p>Response U#47 Filed: 2015-10-22</p>
50	<p>Page 207, lines 3-6</p> <p>Undertaking to provide information with respect to the people who have left Hydro to go to the Lower Churchill project, either being seconded directly or those who took another position.</p>	<p>Board Hearing Counsel Maureen Greene to NLH Panel Robert Henderson Terry Gardiner Darren Moore</p>	<p>Response U#50 Filed: 2015-11-10</p>
51	<p>Page 211, line 22 to Page 212, line 2</p> <p><i>Re: Increase in positions in 2014 and 2015 test years</i></p> <p>Undertaking to provide a breakdown by positions (of the net of the 78 positions)... indication of the areas in which the new resources were added.</p>	<p>Board Hearing Counsel Maureen Greene to NLH Panel Robert Henderson Terry Gardiner Darren Moore</p>	<p>Response U#51 Filed: 2015-10-19</p>

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52	<p>Page 212, lines 11-15</p> <p><i>(Issue Resources in 2014-2015 test years)</i></p> <p>Undertaking for the salary budget to be broken down between <i>number of union and non-union positions</i> in the 2014 and 2015 test years.</p>	<p>Board Hearing Counsel Maureen Greene to NLH Panel Robert Henderson Terry Gardiner Darren Moore</p>	<p>Response U#52 Filed: 2015-10-29</p>
Transcript - October 19, 2015			
53	<p>Page 111, line 23 to Page 112, line 2</p> <p>Undertake to provide Newfoundland Power's inter-affiliate code of conduct (as be compiled and codified in Newfoundland Power's 2008 rate hearing)</p>	<p>CA Thomas Johnson to Brad Rolph</p>	<p>Response U#53 Filed: 2015-10-20</p>
54	<p>Page 119, line 23 to Page 120, line 8</p> <p><i>(Referenced in footnotes of Brad Rolph's evidence)</i></p> <p>Undertake to produce Chapter 7 of the OECD transfer pricing guidelines... and any updates.</p>	<p>IC Counsel Paul Coxworthy to Brad Rolph</p>	<p>Response U#54 Filed: 2015-11-04</p>

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Transcript - October 20, 2015			
55	<p>Page 1, line 15 to Page 2, line 20</p> <p>Undertake to provide Hydro's most recent forecast of its 2015 costs, together with explanations of significant variances between ...the 2015 forecast costs already on the record, as well as significant variance explanations between Hydro's 2014 test year costs and the actuals that are now on the record.</p>	<p>NP Counsel Liam O'Brien</p>	<p>Response U#55 Filed: 2015-11-13</p>
56	<p>Page 22, line 23 to Page 26, line 14</p> <p><i>Re: Weekly ECC Operators Guidelines</i></p> <p>Undertake to provide weekly guidelines for a month in 2015.</p>	<p>NP Counsel Liam O'Brien to NLH Paul Humphries, Robert Moulton, Paul Stratton and Kevin Goulding</p>	<p>Response U#56 Filed: 2015-10-22</p>
57	<p>Page 85, line 25 to Page 87, line 4</p> <p><i>Re: Rolling 12 Month Performance of Hydro's Generating Units Reports</i></p> <p>Undertake to provide the 3rd Quarter Rolling 12 Month Performance of Hydro's Generating Units Report filed with the Board on October 15, 2015.</p>	<p>NP Counsel Liam O'Brien to NLH Paul Humphries, Robert Moulton, Paul Stratton and Kevin Goulding</p>	<p>Response U#57 Filed: 2015-11-06</p>

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58	<p>Page 125, line 12 to Page 129, line 16</p> <p><i>Re: Holyrood CT Commissioning Energy</i></p> <p>Undertake to provide the amount commissioning energy consumed by the Holyrood CT.</p>	<p>NP Counsel Liam O'Brien to NLH Paul Humphries, Robert Moulton, Paul Stratton and Kevin Goulding</p>	<p>Response U#58 Filed: 2015-11-04</p>
59	<p>Page 136, line 22 to Page 137, line 22</p> <p>Undertake to provide how long would you have to run the Holyrood CT to get to the proposed band of \$500,000 in terms of around the deferral account.</p>	<p>NP Counsel Liam O'Brien to NLH Paul Humphries, Robert Moulton, Paul Stratton and Kevin Goulding</p>	<p>Response U#59 Filed: 2015-10-29</p>
60	<p>Page 157, line 13 to Page 160, line 15</p> <p><i>Re: Winter Readiness Report, Page 3</i> <i>Re: Holyrood Unit 1 - Forecast Completion Status: (R/Y/G): Green</i></p> <p>Undertake to provide how the Holyrood Unit 1 - Forecast Completion Status can be considered Green when the progress line is a fair bit away from the plan progress line which is close to the end.</p>	<p>NP Counsel Liam O'Brien to NLH Paul Humphries, Robert Moulton, Paul Stratton and Kevin Goulding</p>	<p>Response U#60 Filed: 2015-10-29</p>

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Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
61	<p>Page 157, line 13 to Page 164, line 17</p> <p><i>Re: Winter Readiness Report</i> <i>Re: Hardwoods GT</i></p> <p>Undertake to provide what the status of Hardwoods is...is it operating now.</p>	<p>NP Counsel Liam O'Brien to NLH Paul Humphries, Robert Moulton, Paul Stratton and Kevin Goulding</p>	<p>Response U#61 Filed: 2015-10-21</p>
62	<p>Page 193, line 17 to Page 195, line 11</p> <p><i>Re: NP-NLH-297 Revision 1</i> <i>Re: 2015 Forecast "Transmission Losses" of the Island Interconnected System</i></p> <p>Undertake to confirm if the losses in the table are calculated over 5 years or 10 years.</p>	<p>NP Counsel Liam O'Brien to NLH Paul Humphries, Robert Moulton, Paul Stratton and Kevin Goulding</p>	<p>Response U#62 Filed: 2015-11-06</p>
Transcript - October 21, 2015			
63	<p>Page 11, line 22 to Page 13, line 7</p> <p>Undertake to provide how many hours the CT ran in August in order to meet the needs...and the cost that was incurred for doing so.</p>	<p>CA Thomas Johnson to NLH Paul Humphries, Robert Moulton, Paul Stratton and Kevin Goulding</p>	<p>Response U#63 Filed: 2015-11-04</p>

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Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
64	<p>Page 15, line 13 to Page 14, line 22</p> <p>Undertake to provide what it would have cost to have a Holyrood unit running (<i>in August</i>) instead (<i>of the CT</i>) to do the work that the CT did.</p>	<p>CA Thomas Johnson to NLH Paul Humphries, Robert Moulton, Paul Stratton and Kevin Goulding</p>	<p>Response U#64 Filed: 2015-11-04</p>
65	<p>Page 21, line 2 to Page 22, line 17</p> <p><i>Re: 12-hour Breakpoint</i></p> <p>Undertake to provide an analysis showing how the 12-hour breakpoint was arrived at.</p>	<p>CA Thomas Johnson to NLH Paul Humphries, Robert Moulton, Paul Stratton and Kevin Goulding</p>	<p>Response U#65 Filed: 2015-11-13</p>
66	<p>Page 22, line 9 to Page 23, line 17</p> <p><i>Re: Protocol for Avalon Reserves</i></p> <p>Undertake to provide something in writing regarding when the CT is to be used.</p>	<p>CA Thomas Johnson to NLH Paul Humphries, Robert Moulton, Paul Stratton and Kevin Goulding</p>	<p>Response U#66 Filed: 2015-10-22</p>

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UNDERTAKINGS

Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
67	<p>Page 42, line 7 to Page 45, line 17</p> <p><i>Re: NP-NLH-297 Revision 1</i> <i>Re: 2015 Forecast "Transmission Losses" of the Island Interconnected System</i></p> <p>Undertake to provide what the differences would be between 5 year average loss rate and 10 year average loss rate.</p>	<p>CA Thomas Johnson to NLH Paul Humphries, Robert Moulton, Paul Stratton and Kevin Goulding</p>	<p>Response U#67 Filed: 2015-11-10</p>
68	<p>Page 80, line 72 to Page 82, line 14</p> <p><i>Re: Undertaking #40</i> <i>Re: Joint Utilities Meeting Minutes dated May 15, 2013</i> <i>Re: Long Harbour Long-term Maintenance Plan</i></p> <p>(a) Undertake to check if the long-term maintenance plan for the Long Harbour transmission line and terminal station was ever provided to Vale.</p> <p>(b) Undertake to provide the long-term maintenance plan for the Long Harbour transmission line and terminal station and any updates that might have been made to it.</p>	<p>CA Thomas Johnson to NLH Paul Humphries, Robert Moulton, Paul Stratton and Kevin Goulding</p>	<p>Response U#68 Filed: 2015-10-29</p>

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Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
69	<p>Page 125, line 15 to Page 128, line 15</p> <p><i>Re: Holyrood Forecast</i></p> <p>Undertake to provide the June 2015 Hydro Thermal Split schedule (spreadsheet).</p>	<p>IC Counsel Paul Coxworthy to NLH Paul Humphries, Robert Moulton, Paul Stratton and Kevin Goulding</p>	<p>Response U#69 Filed: 2015-11-19</p>
Transcript - October 22, 2015			
70	<p>Page 122, line 24 to Page 123</p> <p><i>Re: INFO#9 – (Table 3 -Forecast Reserve Margin based on Current Forecast and OMW Capacity from Holyrood Black start diesels)</i></p> <p>Undertake to Update Table 3 to extend out one more year.</p>	<p>Board Hearing Counsel Maureen Greene to NLH Paul Humphries, Robert Moulton, Paul Stratton and Kevin Goulding</p>	<p>Response U#70 Filed: 2015-11-06</p>

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Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
71	<p>Page 141, line 14</p> <p><i>Re: Projected rate increases for 2020</i></p> <p>Undertaking from Hydro to provide that information, what was provided to Newfoundland Power for the record for this proceeding.</p>	<p>Board Hearing Counsel Maureen Greene to NLH Paul Humphries, Robert Moulton, Paul Stratton and Kevin Goulding</p>	<p>Response U#71 Filed: 2015-11-06</p>
Transcript - October 29, 2015			
72	<p>Page 112, lines 5-6</p> <p><i>Re: January 2013 Outage</i></p> <p>Undertake to provide the numbers of customers who were impacted by (January 2013 outage) that.</p>	<p>CA Thomas Johnson to NLH Rob Henderson Paul Humphries, Terry Ledrew and Darren Moore</p>	<p>Response U#72 Filed: 2015-11-13</p>
73	<p>Page 134, lines 10-19</p> <p>(a) Undertaking to file the same data as regards responsibility for air blast circuit breakers (<i>define which air blast circuit breakers and which power transformers are assigned to which crews</i>)</p> <p>(b) Show the numbers that each crew has.</p>	<p>CA Thomas Johnson to NLH Rob Henderson Paul Humphries, Terry Ledrew and Darren Moore</p>	<p>Response U#73 Filed: 2015-11-19</p>

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Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
74	<p>Page 160, line 14 to Page 161, line 19</p> <p><i>Re: Table 5.1 overdue transformer maintenance and Table 5.2, the overdue breaker maintenance</i></p> <p>(a) How many of the 27 that were identified in 2013 were amongst the numbers reflected in each of the '07, '08, '09, '10, '11 and '12. <i>(how many of those 27, were actually listed as being overdue in '07, '08, '09, '10, 11 and '12)</i></p> <p>(b) And the same for the overdue breaker maintenance.</p>	<p>CA Thomas Johnson to NLH Rob Henderson Paul Humphries, Terry Ledrew and Darren Moore</p>	<p>Response U#74 Filed: 2015-12-11</p>
75	<p>Page 165, lines 10-19</p> <p><i>Re: 6-yr Recovery Plan</i></p> <p>Undertake to see whether it was filed and if not, to file that.</p>	<p>CA Thomas Johnson to NLH Rob Henderson Paul Humphries, Terry Ledrew and Darren Moore</p>	<p>Response U#75 Filed: 2015-12-11</p>
Transcript - October 30, 2015			
76	<p>Page 67, line 10 to Page 69, line 3</p> <p><i>Re: Investigation and Hearing into Supply Issues and Power Outages on the Island Interconnected System</i> <i>Re: Report Regarding Work to be Performed on Transformers dated June 2, 2014</i></p> <p>Undertake to file page B41 of the June 2nd report (<i>Regarding Work to be Performed on Transformers</i>).</p>	<p>CA Thomas Johnson to NLH Rob Henderson Paul Humphries, Terry Ledrew and Darren Moore</p>	<p>Response U#76 Filed: 2015-11-13</p>

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Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
77	<p>Page 69, line 7 to Page 70, line 13</p> <p>Undertake to provide a consultative opinion from the OEM (if one exists in writing) on the transformer prior to the failure.</p>	<p>CA Thomas Johnson to NLH Rob Henderson Paul Humphries, Terry Ledrew and Darren Moore</p>	<p>Response U#77 Filed: 2015-12-11</p>
78	<p>Page 70, line 15 to Page 71, line 17</p> <p><i>Re: Investigation and Hearing into Supply Issues and Power Outages on the Island Interconnected System</i></p> <p>Undertake to provide an opinion from the OEM (from the Root Cause Failure Analysis Report) on the transformer at the time of the failure.</p>	<p>CA Thomas Johnson to NLH Rob Henderson Paul Humphries, Terry Ledrew and Darren Moore</p>	<p>Response U#78 Filed: 2015-11-10</p> <p>Filed electronically only with parties due to size.</p>
79	<p>Page 82, line 11 to Page 84, line 20</p> <p><i>Re: FM Global Documents</i></p> <p>Undertake to provide all FM Global documents that address -- or the excerpts of those documents that address the DC pump and its testing.</p>	<p>CA Thomas Johnson to NLH Rob Henderson Paul Humphries, Terry Ledrew and Darren Moore</p>	<p>Response U#79 Filed: 2015-12-11</p>

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Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
80	<p>Page 129, line 15 to Page 133, line 15</p> <p><i>Re: Criticality assessment done on all the complete plant (Holyrood) and all the systems in the plant (including motors in relation to the AC and DC pumps for the lube oil)</i></p> <p>Undertake to either identify where it is on the record, if it is on the record, or produce it and file it as part of the record.</p>	<p>IC Counsel Paul Coxworthy to NLH Rob Henderson Paul Humphries, Terry Ledrew and Darren Moore</p>	<p>Response U#80 Filed: 2015-12-11</p>
81	<p>Page 184, line 4 to Page 188, line 15</p> <p><i>Re: Information #30</i> <i>Re: Plant Life Extensions Upgrade - Hardwoods Gas Turbine, filed June 2009 as part of the 2010 Capital Budget Application</i> <i>Re: Table 2, Page 7</i></p> <p>Undertake to provide those criteria (individual numbers for the UFOP, for the capability factor and for the failure rate) broken down by year, 2008, 2009, 2010, 2011, 2012, 2013 and 2014 with whatever explanatory footnotes or text...</p>	<p>IC Counsel Paul Coxworthy to NLH Rob Henderson Paul Humphries, Terry Ledrew and Darren Moore</p>	<p>Response U#81 Filed: 2015-12-11</p>
82	<p>Page 199, line 11 to Page 201, line 14</p> <p><i>Re: Information #32</i> <i>Re: Response to IC-NLH-26, attachment one, in the 2011 Capital Budget Application</i></p> <p>Undertake to provide the level one condition assessment (by AMEC) that was referenced in attachment 1 of IC-NLH-26.</p>	<p>IC Counsel Paul Coxworthy to NLH Rob Henderson Paul Humphries, Terry Ledrew and Darren Moore</p>	<p>Response U#82 Filed: 2015-12-11</p>

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Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
Transcript - November 2, 2015			
83	<p>Page 10, line 12 to Page 11, line 6</p> <p><i>Re: La Capra report, February 2011, page 8 of 39 of Appendix B or page six of the La Capra report, second bullet regarding Hydro reporting update to the Board</i></p> <p>Undertaking to get a copy of that email? ...if there's any indication internal to that email that there was an emailprior to that or after that, I'd like to include that in the record in the undertaking request.</p>	<p>IC Counsel Paul Coxworthy to NLH Rob Henderson Paul Humphries, Terry Ledrew and Darren Moore</p>	<p>Response U#83 Filed: 2015-12-09</p>
84	<p>Page 14, line 18 to Page 15, line 4</p> <p><i>Re: Level two condition assessment Hydro - RFP document</i></p> <p>Undertaking to provide...outlined schedule... (in RFP document)</p>	<p>IC Counsel Paul Coxworthy to NLH Rob Henderson Paul Humphries, Terry Ledrew and Darren Moore</p>	<p>Response U#84 Filed: 2015-12-11</p>
85	<p>Page 44, line 21-23</p> <p><i>Re: PR-PUB-NLH-179. Review of its asset management practices in 2011,...including an analysis of the practices of other utilities across North America.</i></p> <p>Undertaking to provide any reports generated in relation to:</p> <p>(a) practices at Holyrood.</p> <p>(b) preventative maintenance programs in general.</p>	<p>Vale Counsel Dennis Fleming to NLH Rob Henderson Paul Humphries, Terry Ledrew and Darren Moore</p>	<p>Response U#85 Filed: 2015-12-11</p>

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Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
86	<p>Page 49, lines 1-4</p> <p><i>Re: Documentation surrounding the development of the new test that relates to what the industry standard was at the time, what other utilities were doing in North America.</i></p> <p>Undertaking to provide...any documentation that shows whether other jurisdictions were already doing these tests in 2012.</p>	<p>Vale Counsel Dennis Fleming to NLH Rob Henderson Paul Humphries, Terry Ledrew and Darren Moore</p>	<p>Response U#86 Filed: 2015-12-11</p>
87	<p>Page 53, lines 21-23</p> <p><i>Re: Documentation that anyone canvassed utilities across North America after (2013) to find out what they were doing with preventative maintenance and whether there was a better procedure or an industry standard procedure that Hydro wasn't following,</i></p> <p>If there was any canvassing of other utilities to see what they were doing,... UNDERTAKING to see the results of that inquiry.</p>	<p>Vale Counsel Dennis Fleming to NLH Rob Henderson Paul Humphries, Terry Ledrew and Darren Moore</p>	<p>Response U#87 Filed: 2015-12-02</p>
88	<p>Page 57, lines 6-19</p> <p><i>Re: Frequency of preventive maintenance(Drain Valve)</i></p> <p>Undertaking for... documentation that relates to changes to the test on the breakers and the results of canvassing of other utilities to see what they were doing (whether other utilities were already doing that procedure prior to the events of January 2013 and 2014).</p>	<p>Vale Counsel Dennis Fleming to NLH Rob Henderson Paul Humphries, Terry Ledrew and Darren Moore</p>	<p>Response U#88 Filed: 2015-12-02</p>

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Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
89	<p>Page 61, lines 6-17</p> <p><i>Re: Canvassing of other utilities to see if that was a standard procedure to put technicians in semi-remote locations when bad weather was called for</i></p> <p>(a) Undertake to provide whether there was any inquiry from other utilities as to whether that was standard practice in other jurisdictions?</p> <p>(b) Mr. Moore offered to provide details of North American Electrical Reliability Council type standards... for preparation and response to storms and compare against what (<i>Hydro was</i>) were doing.</p> <p>(c) Provide any documentation related to what other utilities in North America were doing.</p>	<p>Vale Counsel Dennis Fleming to NLH Rob Henderson Paul Humphries, Terry Ledrew and Darren Moore</p>	<p>Response U#89 Filed: 2015-11-19</p>
90	<p>Page 72, lines 19-25 to Page 73, lines 1-12</p> <p><i>Re: Breakdown of what the vacancies were in each of these maintenance crews between 2009 and 2014.</i></p> <p>Undertaking to see what the vacancy rates (<i>in those particular departments for those years</i>)</p>	<p>Vale Counsel Dennis Fleming to NLH Rob Henderson Paul Humphries, Terry Ledrew and Darren Moore</p>	<p>Response U#90 Filed: 2015-12-02</p>

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Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
Transcript - November 3, 2015			
91	<p>Page 3, line 4 to Page 4, line 2</p> <p>Undertake to provide the names of the people within Hydro that La Capra spoke with in preparation for preparing their report.</p>	<p>NP Counsel Liam O'Brien to La Capra Associates Philip DiDomenico and John Athas</p>	<p>Response U#91 Filed: 2015-12-02</p>
92	<p>Page 15, line 24 to Page 16, line 18</p> <p><i>Re: Participants in the discussions that La Capra had with Hydro in preparation for the La Capra Report</i></p> <p>Undertake to provide the dates of those discussions (with the people within Hydro that La Capra spoke with in preparation for preparing their report).</p>	<p>CA Thomas Johnson to La Capra Associates Philip DiDomenico and John Athas</p>	<p>Response U#92 Filed: 2015-12-02</p>
93	<p>Page 16, line 7 to Page 16, line 18</p> <p>Undertake to provide a list of (<i>the titles of</i>) the documentation/information that you received from Hydro on which you carried out your assignment in this proceeding.</p>	<p>CA Thomas Johnson to La Capra Associates Philip DiDomenico and John Athas</p>	<p>Response U#93 Filed: 2015-11-18</p>

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Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
Transcript - November 4, 2015			
94	<p>Page 19, line 23 to Page 21, line 5</p> <p><i>Re: 10 percent band with respect to whether the cost of a project is on budget or not being within the green bandwidth.</i></p> <p>Undertake to provide if that threshold (10 percent on cost that is within the green bandwidth) has been communicated to the Board with respect to this information?</p>	<p>Board Hearing Counsel Maureen Greene to NLH John MacIsaac</p>	<p>Response U#94 Filed: 2015-12-09</p>
95	<p>Page 26, line 1 to Page 29, line 22</p> <p><i>Re: Information #34</i> <i>Re: Hard scrub and review of ProEnergy's submitted variance regarding the 100 megawatt CT addition at Holyrood.</i></p> <p>Undertake to provide the detail in executive format for all of the units that were involved in the building and all of the incremental claims that add up to make the variance.</p>	<p>Board Hearing Counsel Maureen Greene to NLH John MacIsaac</p>	<p>Response U#95 Filed: 2015-12-08</p>
96	<p>Page 42, line 21 to Page 47, line 18</p> <p><i>Re: Liberty's July 6th Report of Prudence – finding regarding cost with respect to the CT.</i> <i>Re: Commercial discussions with ProEnergy</i></p> <p>Undertake to provide when Hydro and ProEnergy settled the claim.</p>	<p>Board Hearing Counsel Maureen Greene to NLH John MacIsaac</p>	<p>Board Hearing Counsel satisfied that the undertaking has been addressed by Mr. MacDougall's re-examination of Mr. MacIsaac on November 5th, at page 2, lines 5 to 22 of the transcript.</p>

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U Requests	Description	Requested By	Response
97	<p>Page 61, line 3 to Page 62, line 17</p> <p><i>Re: Red, yellow, green threshold levels</i></p> <p>Undertake to provide the definitions around the colour coding with respect to schedule.</p>	<p>Board Hearing Counsel Maureen Greene to NLH John MacIsaac</p>	<p>Response U#97 Filed: 2015-12-02</p>
98	<p>Page 125, lines 15-23</p> <p>Re: in 2012 search, one of the criteria for unit was that could black start at Holyrood</p> <p><i>(black start was not going to be available, that that 13 megawatt GT wasn't going to be available going forward, sort of kick-started some of the discussions then on the CT.)</i></p> <p>Undertaking that you look to see if that was one of the criteria that you looked for.</p>	<p>NP Counsel Liam O'Brien to NLH John MacIsaac</p>	<p>Response U#98 Filed: 2015-11-24</p>
99	<p>Page 166, lines 9-17</p> <p><i>Re: Variance discussed in Information 35</i></p> <p>Undertaking to provide the complete variance of the CT now.</p>	<p>NP Counsel Liam O'Brien to NLH John MacIsaac</p>	<p>Response U#99 Filed: 2015-12-09</p>
100	<p>Page 176, lines 11-17</p> <p><i>Re: Additional contractor claims</i></p> <p>Undertaking to provide labour component</p> <p><i>(Mr. MacIsaac offered to do an executive summary)</i></p>	<p>NP Counsel Liam O'Brien to NLH John MacIsaac</p>	<p>Response U#100 Filed: 2015-12-11</p>

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U Requests	Description	Requested By	Response
101	<p>Page 190, lines 12-24</p> <p><i>Re: RFI PR-DD-NLH-012 July 3-4 scheduled outage (black start configuration)</i></p> <p>Undertaking to confirm what outage dealt with</p>	<p>NP Counsel Liam O'Brien to NLH John MacIsaac</p>	<p>Response U#101 Filed: 2015-11-18</p>
102	<p>Page 191, line 14 to Page 192 , line 11</p> <p><i>Re: RFI PR-DD-NLH-012 - Forced outage on August 6 and 7</i></p> <p>Undertaking to provide report on outage</p>	<p>NP Counsel Liam O'Brien to NLH John MacIsaac</p>	<p>Response U#102 Filed: 2015-11-13</p>
103	<p>Page 193 , lines 1-3 14</p> <p><i>Re: RFI PR-DD-NLH-012</i></p> <p>Undertaking to update the RFI with any further scheduled outages or forced outages for the CT to date</p>	<p>NP Counsel Liam O'Brien to NLH John MacIsaac</p>	<p>Response U#103 Filed: 2015-11-13</p>
Transcript - November 5, 2015			
104	<p>Page 5, line 12 to Page 8, line 113</p> <p><i>Re: Contract with ProEnergy</i></p> <p>Undertake to provide an explanation for the variances between the contract...and the actuals, broken down by those component pieces that we're talking about. ...it'll be the other elements to the extent that they varied from the contract price.</p>	<p>CA Thomas Johnson to NLH John MacIsaac</p>	<p>Response U#104 Filed: 2015-12-08</p>

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U Requests	Description	Requested By	Response
	<p>Additional information requested from November 6, 2015 Page 74, line 3 to Page 76, line 18</p> <p>Undertake to provide an explanation if there's line item discrepancies (they will be noted where there's a change in line items).</p>		
105	<p>Page 21, line 7 to Page 24, line 21</p> <p><i>Re: Revay recommendation</i></p> <p>Undertake to check and see if you did get anything and what that recommendation or opinion in writing as to what the potential risk and exposure was.</p>	<p>CA Thomas Johnson to NLH John MacIsaac</p>	<p>Response U#105 Filed: 2015-12-02</p>
106	<p>Page 24, line 23 to Page 29, line 10</p> <p><i>Re: ProEnergy Contract Variance</i></p> <p>Undertake to provide a copy of any such opinion that grounded your decision to resolve the matter (providing there are no privilege or confidentiality issues around them).</p>	<p>CA Thomas Johnson to NLH John MacIsaac</p>	<p>Response U#106 Filed: 2015-12-08</p>
107	<p>Page 29, line 15 to Page 31, line 3</p> <p><i>Re: Project Management Institute (services of a certified auditor in each of 2011, 2013, and 2015)</i></p> <p>Undertake to provide these reports (of the Project Management Institute) in relation to... 2011, 2013, and 2015.</p>	<p>CA Thomas Johnson to NLH John MacIsaac</p>	<p>Response U#107 Filed: 2015-11-18</p> <p>Filed electronically only with parties due to size.</p>

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U Requests	Description	Requested By	Response
108	<p>Page 56, line 4 to Page 61, line 10</p> <p><i>Re: GT-PUB-NLH-031, Table 1</i></p> <p>Undertake to compile a similar table to Table 1 of what information was obtained in 2012 about the availability of gas turbine options, regardless of the megawatts involved.</p>	<p>IC Counsel Paul Coxworthy to NLH John MacIsaac</p>	<p>Response U#108 Filed: 2015-11-25</p>
109	<p>Page 71, line 11 to Page 76, line 16</p> <p><i>Re: Application for Installation of the 100 megawatt CT, Appendix F1, Page 15 of 26</i></p> <p>Undertake to provide an explanation as to why the risk was assessed as high for the Hardwoods site, as opposed to moderate for 74L?</p>	<p>IC Counsel Paul Coxworthy to NLH John MacIsaac</p>	<p>Response U#109 Filed: 2015-11-18</p>
110	<p>Page 87, line 9 to Page 93, line 22</p> <p><i>Re: Testing for the 100 megawatts ability to provide black start capability</i></p> <p>Undertake to provide a document or a set of documents regarding a schedule generated similar to this project schedule for the smaller aspects of the project with milestone dates.</p>	<p>IC Counsel Paul Coxworthy to NLH John MacIsaac</p>	<p>Response U#110 Filed: 2015-12-02</p>

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U Requests	Description	Requested By	Response
111	<p>Page 112, lines 4-5, and Page 113, lines 16-19</p> <p><i>Re: Advertisement by 24 ProEnergy Parts Solutions and CFAS on the 1X 25 New Siemens SGTG-3000E. -Timing of Advertisement</i></p> <p>Undertake to provide when (Hydro) was aware of the advertisement ... timing of when you received advertised information</p> <p><i>Mr. MacIsaac offered...to check ... if this unit was previously identified in that listing from 2012 or 2013.</i></p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response U#111 Filed: 2015-11-18</p>
112	<p>Page 124, lines 18-20</p> <p><i>Re: RFI GT-DD-NLH-030 - February 2014 Advertised information for CT</i></p> <p>Undertaking ...to provide all information received as a result of ... advertisement?</p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response U#112 Filed: 2015-11-18</p>
113	<p>Page 148, line 13 to Page 149, line 5</p> <p>Undertaking ...to provide any reports or any budget documents that would identify the installation cost of putting (adding) 50 or 60 megawatt combustion turbine</p> <p><i>Mr. MacIsaac offered to include the contractor's cost and our own costs</i></p> <p><i>Mr. Dumaresque clarified to have it broken out between what you had estimated to be the contractor's cost as opposed to the owner's cost.</i></p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response U#113 Filed: 2015-12-08</p>

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Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
114	<p>Page 151, lines 3-11</p> <p>Undertaking to provide the quotes that you received from manufacturers of new equipment in 2013 (2012/2013).</p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response U#114 Filed: 2015-11-25</p>
115	<p>Page 164, lines 3-8</p> <p><i>Re: Documentation on the storage of the CT Unit for two years from 2007 to 2009</i></p> <p>The undertaking is that ... (the storage records start approximately October of 2009. The turbine is a 2007) are there any other records for the period birth, 2007 to October of 2009.</p> <p><i>Mr. MacIsaac offered to confirm that there was a pause in manufacturing.</i></p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response U#115 Filed: 2015-12-02</p>
116	<p>Page 166, lines 3-5</p> <p>Undertake to find a copy of the original PO and specifications for the GT.</p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response U#116 Filed: 2015-11-23</p>
117	<p>Page 174, lines 15-24</p> <p>To check to see if there was a nitrogen blanket applied in the storage of the appropriate components of this package (<i>If it was requested, and - first, if it was requested, was it actually in place?</i>)</p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response U#117 Filed: 2015-11-13</p>

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Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
118	<p>Page 176, line 24 to Page 177, line 2</p> <p><i>Re: general manager of gas turbines and diesels and the mechanical engineer discussed</i></p> <p>Undertake to provide with whatever emails, reports, et cetera, that came from the individuals that you just identified.</p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response U#118 Filed: 2015-12-11</p>
119	<p>Page 195, lines 13-18</p> <p><i>Re: Tender Document referenced in RFI GT-CA-NLH-005, Attachment 1</i></p> <p>(a) Undertake to confirm that there was a certified cheque and/or irrevocable standard standby letter of credit equal to the full value of 10 percent or 9.9 million Canadian dollars on April 21st.</p> <p>Addition to Undertaking from November 6, 2015 – Page 2, line 24 to Page 4, line 22</p> <p>(b) Undertake to provide email from purchasing that confirmed that the surety was in place.</p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response U#119 Filed: 2015-11-23</p>
120	<p>Page 201, lines 2-8</p> <p><i>Re: Tender Document referenced in RFI GT-CA-NLH-005, Attachment 1</i></p> <p>Undertaking to confirm that bidders may submit bids with either new or used equipment.</p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response provided by Mr. MacIsaac during preliminary matters on November 6, 2015 Page 1, line 7 to Page 2, line 4 <i>“the equipment provided shall be new or unused”</i></p>

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Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
Transcript - November 6, 2015			
121	<p>Page 11, line 24 to Page 13, line 18</p> <p><i>Re: GT-CA-NLH-005, Attachment 1 – Tender Technical Evaluation for the 100MW Combustion Turbine (ProEnergy and PW Power Systems Columns only)</i></p> <p><i>Re: SP-2.5</i></p> <p>Undertake to provide the documented start-up time for this plant from Pro Energy.</p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response U#121 Filed: 2015-11-13</p>
122	<p>Page 16, line 16 to Page 18, line 23</p> <p><i>Re: GT-CA-NLH-005, Attachment 1 – Tender Technical Evaluation for the 100MW Combustion Turbine (ProEnergy and PW Power Systems Columns only)</i></p> <p><i>Re: SP-2.5</i></p> <p>Undertake to confirm whether the start-up time of PW Power Systems was provided/obtained.</p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response U#122 Filed: 2015-11-25</p>
123	<p>Page 22, line 5 to Page 26, line 24</p> <p><i>Re: GT-CA-NLH-005, Attachment 1 – Tender Technical Evaluation for the 100MW Combustion Turbine (ProEnergy and PW Power Systems Columns only)</i></p> <p><i>Re: In-service Stretch Target</i></p> <p>Undertake to provide written documentation of this stretch period.</p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response U#123 Filed: 2015-11-18</p>

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UNDERTAKINGS

Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
124	<p>Page 25, line 1 to Page 26, line 24</p> <p><i>Re: GT-CA-NLH-005, Attachment 1 – Tender Technical Evaluation for the 100MW Combustion Turbine (ProEnergy and PW Power Systems Columns only)</i></p> <p><i>Re: In-service Date</i></p> <p>Undertake to provide if in the PW Power Systems bid, did they guarantee an in-service date.</p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response U#124 Filed: 2015-11-18</p>
125	<p><i>Re: GT-CA-NLH-005, Attachment 1 – Tender Technical Evaluation for the 100MW Combustion Turbine (ProEnergy and PW Power Systems Columns only)</i></p> <p>Page 36, line 2 to Page 37, line 2</p> <p><i>Re: SP-8.1</i></p> <p>Undertake to provide the explanation of what that comment (<i>Piping between fuel forwarding and filtering skid by NLH</i>) on SP-8.1 would be.</p> <p>Page 37, line 4 to Page 37, line 19</p> <p><i>Re: SP-8.2</i></p> <p>Undertake to elaborate on the seriousness of that aspect (<i>Redundant AC pumps and filters not provided, but DC backup is provided</i>) to be able to deduct them (<i>PW Power Systems</i>) a half a point.</p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response U#125 Filed: 2015-12-02</p>

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Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
126	<p>Page 37, line 21 to Page 39, line 21</p> <p><i>Re: GT-CA-NLH-005, Attachment 1 – Tender Technical Evaluation for the 100MW Combustion Turbine (ProEnergy and PW Power Systems Columns only)</i> <i>Re: SP-9.20</i></p> <p>Undertake to provide what that comment (<i>site grounding by NLH</i>) meant.</p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response U#126 Filed: 2015-11-25</p>
127	<p>Page 39, line 23 to Page 40, line 15</p> <p><i>Re: GT-CA-NLH-005, Attachment 1 – Tender Technical Evaluation for the 100MW Combustion Turbine (ProEnergy and PW Power Systems Columns only)</i> <i>Re: SP-11.6</i></p> <p>Undertake to provide what that exception (<i>Exception to Galvanized</i>) would be.</p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response U#127 Filed: 2015-11-25</p>
128	<p>Page 45, line 6 to Page 48, line 12</p> <p><i>Re: GT-CA-NLH-005, Attachment 1 – Tender Technical Evaluation for the 100MW Combustion Turbine (ProEnergy and PW Power Systems Columns only)</i> <i>Re: SP-11.7</i></p> <p>Undertake to provide confirmation that you asked them (<i>PW Power Systems</i>) whether they would fence around or not.</p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response U#128 Filed: 2015-11-25</p>

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Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
129	<p>Page 45, line 22 to Page 48, line 12</p> <p><i>Re: GT-CA-NLH-005, Attachment 1 – Tender Technical Evaluation for the 100MW Combustion Turbine (ProEnergy and PW Power Systems Columns only)</i> <i>Re: SP-12</i></p> <p>Undertake to provide explanation as to the comment “<i>Building has been excluded from the execution plan, but the allowance was carried</i>” in the PW Power Systems Column.</p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response U#129 Filed: 2015-11-25</p>
130	<p>Page 46, line 6 to Page 48, line 12</p> <p><i>Re: GT-CA-NLH-005, Attachment 1 – Tender Technical Evaluation for the 100MW Combustion Turbine (ProEnergy and PW Power Systems Columns only)</i></p> <p>Undertake to provide if there was some kind of a formula/structure regarding weighting of the ratings within the document that would have led you to issue the award.</p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response U#130 Filed: 2015-11-23</p>
131	<p>Page 62, line 2 to Page 68, line 23</p> <p><i>Re: GT-PUB-NLH-014, Attachment 1</i></p> <p>Undertake to confirm that the installation... for the equipment and installation of the turbine, generator, mechanical and electrical balance of plant installed at Holyrood, you paid 31.5 million dollars (<i>Canadian Dollars</i>).</p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response U#131 Filed: 2015-11-23</p>

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U Requests	Description	Requested By	Response
132	<p>Page 76, line 22 to Page 78, line 17</p> <p><i>Re: GT-DD-NLH-001, Attachment 1</i> <i>Re: Awarding 2 Contracts</i></p> <p>Undertake to provide documentation on advice regarding 2 contracts from the Finance and Tax (subject to the potential that it may be confidential or otherwise if it's professional advice being given with respect to certain matters).</p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response U#132 Filed: 2015-11-25</p>
133	<p>Page 78, line 19 to Page 80, line 20</p> <p><i>Re: GT-DD-NLH-001, Attachment 1</i> <i>Re: Awarding 2 Contracts</i></p> <p>Undertake to provide who initiated the 2 contracts... did ProEnergy talk first, or...consult your tax department or finance department first.</p>	<p>Danny Dumaresque to NLH John MacIsaac</p>	<p>Response U#133 Filed: 2015-11-23</p>
Transcript - November 9, 2015			
134	<p>Page 38, line 15 to Page 40, line 8</p> <p><i>Re: Sunnyside Equipment Replacement Project</i> <i>Re: Liberty Report, Page 30, Table 5.3</i></p> <p>Undertake to advise of the total/actual cost of the project overall regardless of the period of time over which the dollars were spent.</p>	<p>Board Hearing Counsel Maureen Greene to NLH Michael Conway and Robert Henderson</p>	<p>Response U#134 Filed: 2015-12-11</p>

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Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
135	<p>Page 82, line 4 to Page 83, line 17</p> <p><i>Re: NLH 2013 Amended GRA, Page 3.7, Table 3.1</i></p> <p>Undertake to provide who prepared the table.</p>	<p>NP Counsel Liam O'Brien to NLH Michael Conway and Robert Henderson</p>	<p>NP Counsel satisfied that response from Ms. Russell during testimony of November 16 (Pages 150-160) addresses Undertaking 135.</p>
Transcript - November 12, 2015			
136	<p>Page 113, lines 4-7</p> <p><i>Re: Info #41 Newfoundland Power's Interim Report in the outage inquiry Page 25, line 9</i> <i>(Liberty advised the Board that their understanding of the basis of the cold temperatures affecting the operating mechanism was because the heaters had failed to come on).</i></p> <p>Undertake to advise whether you had indicated the statement you just made in your report on Newfoundland Power.</p> <p><i>(Undertake to confirm the statements provided in testimony in Newfoundland Power's Report).</i></p>	<p>NLH Counsel David MacDougall to Liberty Consulting M. Lautenschlager</p>	<p>Response U#136 Filed: 2015-11-17</p>

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U Requests	Description	Requested By	Response
Transcript - November 16, 2015			
137	Page 26, line 8 to Page 28, line 2 Undertake to provide a copy of Ms. Russell's (<i>General Manager, Finance and Regulatory</i>) job description.	NP Counsel Liam O'Brien to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz	Response U#137 Filed: 2015-11-18
138	Page 82, line 5 to Page 84, line 11 Undertake to provide a copy of the Régie de l'énergie Quebec decision D2002-95 (which shows that Hydro Quebec also pays a 50 basis point fee to its shareholder...).	NP Counsel Liam O'Brien to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz	Response U#138 Filed: 2015-12-02 Attachment 1 filed electronically only due to size.
139	Page 96, line 13 to Page 97, line 12 (a) Undertake to provide a calculation using the assumption that the Board accepted Grant Thornton's opinion...and that the debt guarantee fee for the long term should be between the 35 and 47 basis points with a 50/50 cost savings...calculate what that fee should be... (b) Page 117, lines 11-18 Further to debt guarantee fee – Undertake to get one for the short term debt as well, the basis points assuming there is a 50/50 split of the savings.	NP Counsel Liam O'Brien to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz	Response U#139 Filed: 2015-12-09

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U Requests	Description	Requested By	Response
140	<p>Page 105, line 7 to Page 105, line 20</p> <p>Undertake to advise if the province's credit rating changed in the last number of years...from 2007 onwards.</p>	<p>NP Counsel Liam O'Brien to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#140 Filed: 2015-12-09</p>
141	<p>Page 133, lines 18-21</p> <p><i>Re: Operating Cost Matrix</i></p> <p>Undertake to find out the parameters,...of that cost matrix, and is that something that's looked at on a monthly basis?</p>	<p>NP Counsel Liam O'Brien to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#141 Filed: 2015-12-11</p>
142	<p>Page 156, lines 8-14</p> <p><i>Re: NP-NLH-386</i></p> <p>Undertake to provide...the reason for such an increase in the overtime to 16 million in 2014?</p>	<p>NP Counsel Liam O'Brien to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#142 Filed: 2015-12-11</p>
143	<p>Page 153, line 25 to Page 154, line 4</p> <p>Undertaking to check the difference between the 2014 test year and actual (overtime)?</p>	<p>NP Counsel Liam O'Brien to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#143 Filed: 2015-12-09</p>

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U Requests	Description	Requested By	Response
144	Page 223, line 3 to Page 224, line 9 Undertake to provide the 2016 Budget.	NP Counsel Liam O'Brien to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz	Response U#144 Filed: 2015-12-08
Transcript - November 17, 2015			
145	Page 6, line 1 to Page 9, line 24 <i>Re: Vacancy Adjustment for the 2014 Test Year</i> (a) Undertake to confirm what adjustment was included for the 2014 test year... (b) Undertake to provide the actual experience, the actual number of vacancies for that year... (c) Undertake to provide the impact between the actual and what was included.	NP Counsel Liam O'Brien to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz	Response U#145 Filed: 2015-12-09
146	Page 12, line 3 to Page 16, line 18 <i>Re: NP-NLH-310 – Hydro's Vacancies - 2015</i> Undertake to provide a breakdown of additional overtime or contract work for 2015.	NP Counsel Liam O'Brien to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz	Response U#146 Filed: 2015-12-09

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Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
147	<p>Page 23, line 9 to Page 30, line 14</p> <p><i>Re: Hydro restructuring in 2014 and 2015 – employees transferred from Nalcor to Hydro</i></p> <p>Provide an undertaking to determine what the offsetting cost would be as a result of that transfer.</p>	<p>NP Counsel Liam O'Brien to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#147 Filed: 2015-12-11</p>
148	<p>Page 47, line 21 to Page 49, line 1</p> <p><i>Re: 2014 Rate Base – 100MW CT</i></p> <p>(a) Undertake to check and see if the CT costs are included in the 2014 rate base...</p> <p>(b) If so, undertake to provide if there's any reason why it should remain in there.</p>	<p>NP Counsel Liam O'Brien to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#148 Filed: 2015-12-08</p>
149	<p>Page 50, line 25 to Page 55, line 25</p> <p><i>Re: Undertaking #32 – Revenue Requirements Variance - Multi-year projects</i></p> <p>Undertake to confirm when you have the 2.1 million dollar revenue requirement variance, which one of these projects are taken out then of that rate base.</p>	<p>NP Counsel Liam O'Brien to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#149 Filed: 2015-12-11</p>

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U Requests	Description	Requested By	Response
150	<p>Page 56, lines 2 to 11</p> <p><i>Re: PUB-NLH-487 Rev 1 - Reduction in 2014 Test Year Revenue Requirement of \$2.1 million</i></p> <p>Undertake to provide the calculation of that variance, the 2.1.</p>	<p>NP Counsel Liam O'Brien to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#150 Filed: 2015-12-11</p>
151	<p>Page 79, line 20 to Page 81, line 20</p> <p><i>Re: Brad Rolph - potential impact or overstatement of common services costs of somewhere in the range of about \$70,000...for 2015</i></p> <p>Undertake to advise if Hydro has confirmed that figure or looked at that at all...or able to confirm if that's accurate for 2015 and 2014.</p>	<p>NP Counsel Liam O'Brien to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#151 Filed: 2015-12-08</p>
152	<p>Page 81, line 22 to Page 83, line 18</p> <p><i>Re: Mark-up of intercompany charges</i></p> <p>Undertake to provide calculations with respect to transacting with Churchill Falls, if there was a markup provided...for the two test years (2014 and 2015).</p>	<p>NP Counsel Liam O'Brien to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#152 Filed: 2015-12-08</p>
153	<p>Page 92, line 7 to Page 93, line 6</p> <p><i>Re: 2015 Cost Recovery Application - five million dollar adjustment</i></p> <p>Undertake to provide confirmation as to what projects were included in that 5.1 million, in terms of revenue in 2015.</p>	<p>NP Counsel Liam O'Brien to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#153 Filed: 2015-12-11</p>

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U Requests	Description	Requested By	Response
154	<p>Page 114, line 12 to Page 116, line 25</p> <p><i>Re: PUB-NLH-228, Attachment 1 - V-P Finance and Chief Financial Officer Hours</i></p> <p>Undertake to provide the actual descriptions of what made up these charges in 2012 and 2013...how did we arrive at the 48 hours and the 60.</p>	<p>CA Thomas Johnson to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#154 Filed: 2015-11-24</p>
155	<p>Page 132, line 12 to Page 136, line 7</p> <p><i>Re: Undertaking 51, FTE additions in 2014 and 2015</i></p> <p>Undertake to provide the job descriptions or position descriptions for two new positions under the engineering and operating, cost controller.</p>	<p>CA Thomas Johnson to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#155 Filed: 2015-11-24</p>
156	<p>Page 143, line 4 to Page 145, line 18</p> <p><i>Re: Number of business units in regulated Hydro</i></p> <p>Undertake to provide what Hydro's business units are.</p>	<p>CA Thomas Johnson to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#156 Filed: 2015-12-11</p>

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U Requests	Description	Requested By	Response
Transcript - November 18, 2015			
157	<p>Page 5, line 20 to Page 6, line 10</p> <p><i>Re: Site Service Administrator Position</i></p> <p>Undertake to provide the job description of that particular role (<i>Site Service Administrator</i>).</p>	<p>CA Thomas Johnson to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#157 Filed: 2015-11-26</p>
158	<p>Page 6, line 12 to Page 10, line 21</p> <p><i>Re: Grant Thornton - financial consultants report, Page 114</i> <i>Re: Capital Expenditures</i></p> <p>(a) Undertake to provide an apples to apples comparison of the 119.6 that was forecast for 2015.... an apples to apples of where we are, what's the present forecast for 2015 as compared to that 119.6...in relation to the information that's in the test year.</p> <p>(b) Undertake to confirm Hydro's position on that point (<i>an adjustment to rate base in the test year for 2015</i>) in an undertaking.</p>	<p>CA Thomas Johnson to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#158 Filed: 2015-12-11</p>
159	<p>Page 14, line 9 to Page 15, line 10</p> <p><i>Re: Undertaking 55, Attachment 2, Page 1</i> <i>Re: 2015 Forecast vs. 2015 Test year Variance</i></p> <p>Undertake to provide the explanation for that full 700,000 increase.</p>	<p>CA Thomas Johnson to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#159 Filed: 2015-12-09</p>

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U Requests	Description	Requested By	Response
160	<p>Page 22, line 19 to Page 27, line 1</p> <p><i>Re: NP-NLH-197, Attachment 1 – Grant Thornton Review of Intercompany Transactions -2008 to 2010</i></p> <p>Undertake to provide a markup such as we see that would apply to an external billing, in the case of CF(L)Co...what the impact would be for the 2014 and 2015 test year if markup as used for external purposes like described here (<i>Grant Thornton Review of Intercompany Transactions</i>) was used.</p>	<p>CA Thomas Johnson to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#160 Filed: 2015-12-08</p>
161	<p>Page 26, line 7 to Page 27, line 1</p> <p><i>Re: External billing markup</i></p> <p>Undertake to advise us as to what agreement might be in place that would bear upon the ability to charge that markup.</p>	<p>CA Thomas Johnson to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#161 Filed: 2015-12-08</p>
162	<p>Page 57, line 19 to Page 59, line 3</p> <p><i>Re: Original 2013 General Rate Application filed July, 2013</i></p> <p>Undertake to provide a target date that Hydro was hoping to have new rates in place coming out of the original July, 2013 filing.</p>	<p>IC Counsel Paul Coxworthy to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#162 Filed: 2015-11-24</p>

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Last Updated: 2015-12-17

U Requests	Description	Requested By	Response
163	<p>Page 62, line 9-22</p> <p><i>Re: PUB-NLH 228, Attachment 1 (Revision 5)</i></p> <p>Undertake to file an update (Revision 6), so that rather than have to go to Grant Thornton's Report, that we would have Hydro's position on the record of what Nalcor leadership time is being charged in to the 2015 test year.</p> <p>Page 62, line 22 to Page 71, line 18</p> <p>Undertake to provide us with the 2014 information in terms of what Nalcor leadership team is being charged in towards the revenue deficiency for 2014.</p> <p>Revision 6 will have both 2014 and 2015.</p>	<p style="text-align: center;">IC Counsel Paul Coxworthy to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p style="text-align: center;">Response U#163 Filed: 2015-12-09</p>
164	<p>Page 86, line 19 to Page 88, line 10</p> <p><i>Re: Undertaking 22 – Mr. Roberts Work Codes</i></p> <p>Undertake to provide the work order in relation to Public Inquiry Costs.</p>	<p style="text-align: center;">IC Counsel Paul Coxworthy to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p style="text-align: center;">Response U#164 Filed: 2015-12-09</p>

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U Requests	Description	Requested By	Response
165	<p>Page 94, line 9 to Page 95, line 5</p> <p><i>Re: Transcript of September 11, 2015, Page 75, line 12 - Mr. Martin Testimony</i></p> <p>(a) Undertake to advise if there's a worksheet or worksheets related to the integration piece, if so provide those...</p> <p>Page 94, line 9 to Page 97, line 20</p> <p>(b) Undertake to provide the information on the worksheets that would explain whether it's time that's directly billed to Hydro versus time that's not.</p>	<p>IC Counsel Paul Coxworthy to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#165 Filed: 2015-12-11</p>
166	<p>Page 105, line 9 to Page 111, line 14</p> <p><i>Re: Exploits Power</i></p> <p>Undertake to advise whether there is any maximum or minimum amount that Hydro is committed to buy in Exploits power.</p>	<p>IC Counsel Paul Coxworthy to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#166 Filed: 2015-11-23</p>
167	<p>Page 117, lines 10-17</p> <p>Undertake to provide a copy of the BCUC decision # BC-UC-G9604 and the heritage directive #2 in relation to BC Hydro.</p>	<p>IC Counsel Paul Coxworthy to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#167 Filed: 2015-11-23</p>

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U Requests	Description	Requested By	Response
168	<p>Page 121, line 23 to Page 122, line 21</p> <p><i>Re: PUB-NLH-388 (Table 1)</i></p> <p>Undertake to provide the relevant orders relating to deferral accounts established for Manitoba Hydro, Ontario Power, Nova Scotia.</p>	<p>IC Counsel Paul Coxworthy to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#168 Filed: 2015-12-09</p>
169	<p>Page 138, lines 6-15</p> <p>Undertake to advise if there has been any volatility associated with the consumer price index in recent years,...go back... five years?</p>	<p>IC Counsel Paul Coxworthy to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#169 Filed: 2015-12-09</p>
170	<p>Page 146, line 18 to Page 147, line 4</p> <p><i>Re: Schedule VI, of Section 2 of the Evidence p1/1 Power purchases that are forecast for 2015 in Schedule VI</i></p> <p>Undertake to obtain an assessment of the likely variability in volume of purchases under those contracts... and how that's been addressed, if at all, in the deferral account in Schedule VII.</p>	<p>IC Counsel Paul Coxworthy to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#170 Filed: 2015-12-09</p>

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171	<p>Page 169, line 7 to Page 170, line 10</p> <p><i>Re: Deferral account, Schedule 7</i></p> <p>Undertaking for an example that shows how the customers would be protected under that deferral account as it's currently worded.</p> <p><i>Ms. Lutz advised they work through some scenarios and present it back.</i></p>	<p>IC Counsel Paul Coxworthy to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#171 Filed: 2015-12-09</p>
172	<p>Page 197, line 17 to Page 198, line 10</p> <p><i>Re: RFI 089, Tables 1 and 2</i></p> <p>Undertaking to confirm that Hydro has included this catch up maintenance costs in the 2014 revenue deficiency deferral application for 45.9 million dollars.</p>	<p>Vale Counsel Thomas O'Reilly to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#172 Filed: 2015-12-11</p>
173	<p>Page 198, line 14 to Page 199, line 2</p> <p>Undertake to advise how much of the 763,000 dollars has been included in the 60 million dollar 2015 revenue deficiency application.</p>	<p>Vale Counsel Thomas O'Reilly to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#173 Filed: 2015-12-09</p>
174	<p>Page 202, lines 22-25</p> <p>Undertake to provide me with any materials in the contract or any documentation that would show that with regard to the expected December 2014 completion date.</p>	<p>Vale Counsel Thomas O'Reilly to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#174 Filed: 2015-12-02</p>

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U Requests	Description	Requested By	Response
175	<p>Page 203, lines 1-16</p> <p>Undertake to provide any documentation related to when Hydro was first aware, the CT would not be in operation by the end of 2014.</p>	<p>Vale Counsel Thomas O'Reilly to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#175 Filed: 2015-12-02</p>
176	<p>Page 204, lines 2-6</p> <p>Undertake to provide any documentation related to any penalties that might be payable by the contractor for failing to meet a December 2014 completion date?</p>	<p>Vale Counsel Thomas O'Reilly to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#176 Filed: 2015-12-02</p>
177	<p>Page 1, line 20 to Page 3, line 17</p> <p><i>Re: Organization structure at Hydro as per organizational chart in PUB-NLH-138.</i></p> <p>Undertake that PUB-NLH-138, Revision 2 be updated to reflect the current structure of the regulated utility for Hydro.</p>	<p>Board Hearing Counsel Maureen Greene to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#177 Filed: 2015-12-09</p> <p>Response U#177 Rev 1 Filed: 2015-12-17</p>
178	<p>Page 25, line 1 to Page 31, line 15</p> <p><i>Re: Undertaking 139</i></p> <p>Undertake, with respect to the analysis showing, what the fee would be if the fee was selected at the midpoint of the range of each of these two ranges that are here. So the midpoint of the range for short term between 31.7 and 33, and 14 the midpoint of between 35.6 and 47.8 for long term.</p>	<p>Board Hearing Counsel Maureen Greene to NLH Panel Carla Russell Scott Pelley Carol Ann Lutz</p>	<p>Response U#178 Filed: 2015-12-09</p>

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Transcript - November 23, 2015			
179	<p>Page 74, line 23 to Page 84, line 14</p> <p><i>Re: Winter Readiness Program</i></p> <p>Undertake to provide the date as to when you would have started that (<i>Winter Readiness Program</i>).</p>	<p>NP Counsel Liam O'Brien to NLH Panel Dawn Dalley Barry Brophy Anthony Lye</p>	<p>Response U#179 Filed: 2015-12-02</p>
180	<p>Page 84, line 16 to Page 85, line 15</p> <p><i>Re: Winter Readiness Update</i></p> <p>Undertake to advise when the Winter Readiness Update went out.</p>	<p>NP Counsel Liam O'Brien to NLH Panel Dawn Dalley Barry Brophy Anthony Lye</p>	<p>Response U#180 Filed: 2015-12-02</p>
181	<p>Page 149, line 14 to Page 161, line 1</p> <p><i>Re: forecasted reduction of FTEs through the implementation of automatic metering</i></p> <p>Undertaking to confirm reduction of four FTEs through the implementation of automatic metering.</p>	<p>NP Counsel Liam O'Brien to NLH Panel Dawn Dalley Barry Brophy Anthony Lye</p>	<p>Response U#181 Filed: 2015-12-08</p>
182	<p>Page 161, lines 5-23</p> <p><i>Re: transfer of FTEs to Nalcor</i></p> <p>Undertake to confirm if there were any FTEs transferred to Hydro.</p>	<p>NP Counsel Liam O'Brien to NLH Panel Dawn Dalley Barry Brophy Anthony Lye</p>	<p>Response U#182 Filed: 2015-12-08</p>

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U Requests	Description	Requested By	Response
183	<p>Page 163, line 3 to Page 164, line 23</p> <p><i>Re: increase of 5.5 FTEs in Corporate Relations as per NP-NLH-228 (Rev 1), page 3 lines 15-16 and IC-NLH-096</i></p> <p>Undertake to provide reconciliation of the difference in the increase of 5.5 vs. 4 in FTEs.</p>	<p>NP Counsel Liam O'Brien to NLH Panel Dawn Dalley Barry Brophy Anthony Lye</p>	<p>Response U#183 Filed: 2015-12-11</p>
184	<p>Page 165, line 4 to Page 166, line 14</p> <p><i>Re: PUB-NLH-423, Attachment 1, Newfoundland and Labrador Hydro Corporate Services Charged by Affiliate #1, December 31, 2011-2015</i></p> <p>Undertake to confirm is this for one affiliate or if it's for all, sort of as a charging into Hydro.</p>	<p>NP Counsel Liam O'Brien to NLH Panel Dawn Dalley Barry Brophy Anthony Lye</p>	<p>Response U#184 Filed: 2015-12-08</p>
185	<p>Page 166, line 22 to Page 167, line 3</p> <p><i>Re: PUB-NLH-423, Attachment 1, Newfoundland and Labrador Hydro Corporate Services Charged by Affiliate #1, December 31, 2011-2015</i></p> <p>Undertake to provide an explanation for increase for Corporate Relations charges into Hydro from 2013 of \$164,000 to 2014 of \$195,000.</p>	<p>NP Counsel Liam O'Brien to NLH Panel Dawn Dalley Barry Brophy Anthony Lye</p>	<p>Response U#185 Filed: 2015-12-08</p>

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U Requests	Description	Requested By	Response
186	<p>Page 167, lines 12-20</p> <p><i>Re: PUB-NLH-423, Attachment 1, Newfoundland and Labrador Hydro Corporate Services Charged by Affiliate #1, December 31, 2011-2015</i></p> <p>Undertake to provide if decrease for Corporate Relations charges from 2014 of \$195,000 to 2015 of \$69,000 would be related to the move of employees from Nalcor to Hydro.</p>	<p>NP Counsel Liam O'Brien to NLH Panel Dawn Dalley Barry Brophy Anthony Lye</p>	<p>Response U#186 Filed: 2015-12-08</p>
187	<p>Page 221, line 1 to Page 222, line 9</p> <p><i>Re: IN-NLH-009, Attachment 2, page 35 of 53, estimated cost and energy savings for the Isolated Systems Community Program</i></p> <p>Undertake to provide what the estimates were and the targets were versus, for each of these years and the actual results.</p>	<p>CA Thomas Johnson to NLH Panel Dawn Dalley Barry Brophy Anthony Lye</p>	<p>Response U#187 Filed: 2015-12-02</p>
Transcript - November 24, 2015			
188	<p>Page 7, line 24 to Page 9, line 16</p> <p><i>Re: Percentage of overall energy savings in isolated communities</i></p> <p>Undertake to provide how you arrive at that figure (59 percent)...</p>	<p>CA Thomas Johnson to NLH Panel Dawn Dalley Barry Brophy Anthony Lye</p>	<p>Response U#188 Filed: 2015-12-02</p>

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189	<p>Page 35, line 22 to Page 36, line 24</p> <p><i>Re: Vice-President, Corporate Relations and Customer Service, Dawn Dalley – Performance Contracts</i></p> <p>Undertake to provide your performance contracts from the time of your becoming vice-president to the present.</p>	<p>CA Thomas Johnson to NLH Panel Dawn Dalley Barry Brophy Anthony Lye</p>	<p>Response U#189 Filed: 2015-12-08</p>
190	<p>Page 37, line 1 to Page 38, line 9</p> <p><i>Re: Liberty's Report on the March 4, 2015 Outage</i></p> <p>Undertake to file what changes actually have been made about the notification to customers in the wake of the Liberty recommendation... on the communications piece.</p>	<p>CA Thomas Johnson to NLH Panel Dawn Dalley Barry Brophy Anthony Lye</p>	<p>Response U#190 Filed: 2015-12-09</p>
191	<p>Page 74, line 24 to Page 79, line 1</p> <p><i>Re: single point of contact for account management for industrial/key customers</i></p> <p>Undertake to provide the draft framework (in relation to a single point of contact for account management for industrial/key customers).</p>	<p>IC Counsel Paul Coxworthy to NLH Panel Dawn Dalley Barry Brophy Anthony Lye</p>	<p>Response U#191 Filed: 2015-12-02</p>
192	<p>Page 140, line 2 to Page 144, line 14</p> <p><i>Re: CA-NLH-323, Attachment 1, Page 10 – 2014 Service Reliability Score</i></p> <p>Undertake to provide tables from the service provider that conducts the survey regarding what the other 48 percent of isolated customers had to say...53 percent said yes, you're doing a good job. And I'm asking you what does the other 48 percent say, of the isolated now.</p>	<p>NG Counsel Genevieve Dawson to NLH Panel Dawn Dalley Barry Brophy Anthony Lye</p>	<p>Response U#192 Filed: 2015-12-02</p> <p>Response U#192 Rev 1 Filed: 2015-12-09</p>