

May 8, 2014

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Via Electronic Mail and Courier

Newfoundland and Labrador Board of Commissioners of Public Utilities 120 Torbay Road P.O. Box 21040 St. John's, NL A1A 5B2

Attention: Ms. G. Cheryl Blundon, Director of Corporate Services

and Board Secretary

Dear Ms. Blundon:

Re: General Rate Application of Newfoundland and Labrador Hydro

Please find enclosed the original and twelve (12) copies of the Requests for Information of the Island Industrial Customers Group in the above Application.

We trust you will find the enclosed to be in order.

Yours truly,

Stewart McKelvey

Paul L. Coxworthy

PLC/sam

Enclosures

c. Geoffrey P. Young, Senior Legal Counsel, Newfoundland and Labrador Hydro Thomas J. Johnson, Consumer Advocate

Gerard Hayes, Newfoundland Power

Dean A. Porter, Poole Althouse

Thomas O'Reilly, Q.C., Vale Newfoundland and Labrador Limited

Edward M. Hearn QC, Miller & Hearn

Stephanie Kearns / Senwung Luk, Olthuis, Kleer, Townshend LLP

Yvonne Jones, MP, Labrador

227025 v1

IN THE MATTER OF the *Public Utilities Act*, R.S.N. 1990, Chapter P-47 (the "Act"); and

IN THE MATTER OF a General Rate Application (the Application) by Newfoundland and Labrador Hydro for approvals of, under Section 70 of the Act, changes in the rates to be charged for the supply of power and energy to Newfoundland Power, Rural Customers and Industrial Customers; and under Section 71 of the Act, changes in the Rules and Regulations applicable to the supply of electricity to Rural Customers

1 2 3	REQUES	ETS FOR INFORMATION RELATING TO INTERVENORS' EXPERT EVIDENCE ISLAND INDUSTRIAL CUSTOMERS GROUP
4		IC-CA-1 to IC-CA-6
5	IC-CA-1	Re: Pre-filed Testimony of Douglas Bowman, page 10.
6 7 8 9 10		With regard to the "1½ years of free power" analysis, please confirm that this conclusion is based on assuming that the RSP was operated since 2006 under a load variation provision that has not been approved by the PUB.
11	IC-CA-2	Re: Pre-filed Testimony of Douglas Bowman, page 11.
12 13 14		Please provide reference to the PUB decision and rate schedules that approves any surcharge or rate increase to NP's customers of \$147/customer.
15	IC-CA-3	Re: Pre-filed Testimony of Douglas Bowman, page 24.
16 17 18 19		Is it Mr. Douglas Bowman's view that the expectation of Muskrat Falls coming on line, with a lower and/or uncertain marginal cost of energy by 2017, is a basis for rejection of the proposed CBPP contract?

1 IC-CA-4 Re: Pre-filed Testimony of Douglas Bowman, page 24. The 2 Testimony indicates that CA-NLH-62 shows that the benefits of the 3 CBPP contract "are not shared on the basis of energy ratios". 4 However, it appears that the cited question, CA-NLH-62, is in 5 regard to a different exhibit and the RSP. 6 Please indicate how CA-NLH-62 (as cited by Mr. 7 Douglas Bowman) indicates that the CBPP benefits 8 are not shared based on energy. 9 IC-CA-5 Re: Pre-filed Testimony of Douglas Bowman, page 24, line 16. The Testimony indicates that the CBPP "Costs Exceed Benefits". 10 11 However, the Hydro evidence indicates that the agreement provides net savings to both CBPP and all other ratepayers, with no 12 13 incremental costs? 14 Please indicate what is meant by "costs" at line 16. 15 IC-CA-6 Re: Pre-filed Testimony of Douglas Bowman, page 26. The Testimony recommends that the current contract with CBPP should 16 be split into 2 (one to buy generation from Deer Lake, and one to 17 sell firm power to CBPP). Specifically, it notes "(t)he contract with 18 Deer Lake Power generation would be similar to other power 19 purchase agreements with generators on the Island Interconnected 20 System". 21 22 Please indicate the pricing that Mr. Douglas Bowman 23 recommends be applied to the Deer Lake power 24 output. For example, would the pricing be equal to the pricing provided to the Corner Brook co-generation 25 26 facility output? Alternatively, would the pricing be 27 equivalent to other hydraulic firm power generation 28 sources, such as Rattle Brook?

<u>DATED</u> at St. John's, in the Province of Newfoundland and Labrador, this 8th day of May, 2014.

POOLE ALTHOUSE

Per

Dean A Porter

STEWART MCKELVEY

Per

Paul L. Coxworthy

TO: The Board of Commissioners of Public Utilities

Suite E210, Prince Charles Building

120 Torbay Road P.O. Box 21040

St. John's, NL A1A 5B2

Attention: Board Secretary

TO: Newfoundland & Labrador Hydro

P.O. Box 12400 500 Columbus Drive St. John's, NL A1B 4K7

Attention: Geoffrey P. Young,

Senior Legal Counsel

TO: Thomas Johnson, Consumer Advocate

O'Dea, Earle Law Offices 323 Duckworth Street St. John's, NL A1C 5X4

TO: Newfoundland Power Inc.

P.O. Box 8910 55 Kenmount Road St. John's, NL A1B 3P6 Attention: Gerard Hayes,

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TO: Cox & Palmer

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Attention: Edward M. Hearn Q.C.

TO: Olthuis, Kleer, Townshend LLP

229 College Street, 3rd Floor

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Attention: Stephanie Kearns / Senwung Luk

TO: House of Commons

Confederation Building

Room 682

Ottawa, ON K1A 0A6

Attention: Yvonne Jones, Member of Parliament, Labrador