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May 8, 2014

Paul L. Coxworthy Direct Dial: 709.570.8830 pcoxworthy@stewartmckelvey.com

## 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

 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 **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) bv 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 enerav 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 **REQUESTS FOR INFORMATION RELATING TO INTERVENORS' EXPERT** 2 **EVIDENCE** ISLAND INDUSTRIAL CUSTOMERS GROUP 3 4 IC-NP-1 to IC-NP-4 IC-NP-1 Re: Pre-filed Testimony of Larry Brockman, page 8, footnote 16. 5 Please provide copy of "2013 Curtailable Service 6 Option Report, Newfoundland Power, April 19, 2013" 7 as referenced in footnote 16 on page 8. 8 Re: Pre-filed Testimony of Larry Brockman, Section 4, Treatment of 9 IC-NP-2 Curtailable Load. 10 11 Please provide, by month, for each of January, February, March, November and December for each 12 of 2011, 2012 and 2013: NP's native peak, along with 13 14 the NP generation, purchased power and curtailed load information for that interval, for: (1) NP's highest 15 monthly native load exclusive of the effects of 16 curtailments: (2) NP's highest monthly native load 17 inclusive of the effects of curtailments; (3) NP's 18 highest purchased power load. 19

1 IC-NP-3 Re: Pre-filed Testimony of Larry Brockman, Section 4, Treatment of 2 Curtailable Load. 3 Please provide a list of each load curtailment incident, 4 noting the length, number of customers affected 5 (curtailment request received), number of customers 6 who actually curtailed, and total load curtailed. Please 7 indicate for each incident whether it was initiated by 8 NP or Hydro, and for NP initiated requests, please 9 provide the brief rationale for the curtailment request 10 (e.g., distribution system constraint, supply constraint 11 from Hydro, avoid monthly/annual peak, etc.) for the 12 last three years (2011, 2012 and 2013). 13 IC-NP-4 Re: Pre-filed Testimony of Larry Brockman, Section 4, Treatment of 14 Curtailable Load. 15 Please indicate if the NP Load forecast used for 16 Hydro's 2013 GRA was prepared by NP or Hydro. 17 Also please indicate if this same load forecast was 18 used by NP for the purpose of regulatory filings, 19 financial planning or other purposes for 2013. Please 20 indicate, for each month, the assumption in regards to 21 the curtailment or non-curtailment of Curtailable 22 Service Option loads at peak times, and provide the 23 kW of assumed curtailment, if any.

**DATED** 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: 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 Newfoundland & Labrador Hydro P.O. Box 12400 500 Columbus Drive St. John's, NL A1B 4K7 Attention: Geoffrey P. Young, Senior Legal Counsel Thomas Johnson, Consumer Advocate O'Dea, Earle Law Offices 323 Duckworth Street St. John's, NL A1C 5X4 Newfoundland Power Inc. P.O. Box 8910 55 Kenmount Road St. John's, NL A1B 3P6 Attention: Gerard Hayes, Senior Legal Counsel Cox & Palmer Scotia Centre, Suite 1000 235 Water Street St. John's, NL A1C 1B6 Attention: Thomas J. O'Reilly Q.C.

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- TO: Miller & Hearn 450 Avalon Drive PO Box 129 Labrador City NL A2V 2K3 Attention: Edward M. Hearn Q.C.
- TO: Olthuis, Kleer, Townshend LLP 229 College Street, 3rd Floor Toronto ON M5T 1R4 Attention: Stephanie Kearns / Senwung Luk
- TO: House of Commons Confederation Building Room 682 Ottawa, ON K1A 0A6 Attention: Yvonne Jones, Member of Parliament, Labrador