

HAND DELIVERED

August 12, 2013

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

Attention: G. Cheryl Blundon
Director of Corporate Services
and Board Secretary

Ladies and Gentlemen:

Re: An Application by Newfoundland and Labrador Hydro pursuant to Section 70(1) and 76 of the Act for approval of the Rate Stabilization Plan rules and components of the rates to be charged to Industrial Customers.

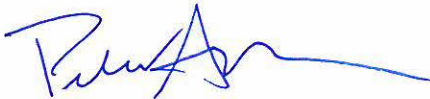
Please find enclosed the original and 12 copies of Newfoundland Power's (i) Intervenor's Submission and (ii) Requests for Information NP-NLH-1 to NP-NLH-11 in relation to the above-noted Application.

For convenience, the Intervenor's Submission and Requests for Information are provided on three-hole punched paper.

A copy of this letter, together with enclosures, has been forwarded directly to the parties listed below.

If you have any questions regarding the enclosed, please contact the undersigned at your convenience.

Yours very truly,



Peter Alteen
Vice President
Regulation & Planning

Enclosures



IN THE MATTER OF the *Electrical Power Control Act*, RSNL 1994, Chapter E-5.1 (the “*EPCA*”) and the *Public Utilities Act*, RSNL 1990, Chapter P-47 (the “*Act*”), and regulations thereunder;

IN THE MATTER OF an Application by Newfoundland and Labrador Hydro for the approval, pursuant to Sections 70(1) and 76 of the Act, of the Rate Stabilization Plan rules and components of the rates to be charged to Industrial Customers (the “Application”).

**Requests for Information by
Newfoundland Power Inc.**

NP-NLH-1 to NP-NLH-11

August 12, 2013

c. Geoffrey Young
Newfoundland and Labrador Hydro

Paul Coxworthy
Stewart McKelvey

Greg Moores
Stewart McKelvey

Mark Sheppard
Vale Newfoundland & Labrador Limited

Thomas Johnson
O'Dea Earle Law Offices

Dean A. Porter
Poole Althouse

Sheryl Nisenbaum
Praxair Canada Inc.



Requests for Information

- NP-NLH-1 OC2013-090 (as amended) directs that, effective August 31, 2013, Island Industrial customers rates, "...will no longer be frozen...". Given this, what justification, if any, does OC2013-090 (as amended) provide to implement *final* Island Industrial customer rates (as opposed to *interim* Island Industrial customer rates) on September 1, 2013?
- NP-NLH-2 Certain proposed RSP changes, such as changes to the load variation component, will ultimately impact Newfoundland Power and its customers. Given the lack of evidence Hydro has provided with the Application related to these forecast impacts, is it reasonable for the Board to approve the proposals on the Application on an *interim* (as opposed to *final*) basis?
- NP-NLH-3 So long as there is compliance with the terms of OC2013-090 (as amended), please indicate the respective advantages and disadvantages of the Board's ordering implementation of *final* vs. *interim* Island Industrial customer rates and Rate Stabilization Plan rules on September 1, 2013.
- NP-NLH-4 Please indicate why Hydro has chosen to not propose to dispose of the IC RSP surplus balance through energy charge adjustments in a manner consistent with historical disposition of Industrial RSP balances.
- NP-NLH-5 Please confirm that if this Application is approved by the Board and if the disposition of the IC RSP surplus balance exceeds \$49 million, then any distributed excess will not be recoverable by Hydro from Newfoundland Power, Newfoundland Power's customers, or any RSP balances in their favor.
- NP-NLH-6 When does Hydro currently forecast that Teck Resources will discontinue operations?
- NP-NLH-7 Please indicate the impacts on the distribution of the IC RSP surplus balance if Teck Resources discontinues operations prior to each of September 1, 2014; September 1, 2015; and September 1, 2016.
- NP-NLH-8 Please provide the explanation and calculation of the Teck Resources RSP surplus adjustment of (1.111)¢ per kWh found in Schedule A to the Application.
- NP-NLH-9 The base Island Industrial customer energy rate proposed in the Application is 3.676¢ per kWh. Hydro currently estimates the marginal island production cost at 17.77¢ per kWh. (See *2013 General Rate Application Evidence*, page 4.17, line 9). Please indicate the forecast impact of adoption of the load variation component proposed in the Application on future energy conservation by Industrial Customers.
- NP-NLH-10 At Table 4, page 12 of the *July 2013 Rate Stabilization Plan Evidence* differing rate impacts are indicated for each of Vale and Praxair. Please provide an explanation of these differing impacts.

NP-NLH-11 At Schedule B, page RSP-9 of the Application, it is indicated that “F = Phase-In Industrial Customer rate in effect as of August 31 of the preceding year.” Please confirm that it is intended that “F = Phase-in Industrial Customer rate in effect as of *September 1st* of the preceding year.”

RESPECTFULLY SUBMITTED at St. John’s, Newfoundland and Labrador, this 12th day of August, 2013.

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