

IN THE MATTER OF the *Public Utilities Act*, R.S.N.L. 1990, Chapter P-47, as amended, (the “Act”); and

IN THE MATTER OF an investigation and hearing into supply issues and power outages on the Island Interconnected System.

NEWFOUNDLAND POWER’S ISSUES LIST
(Submitted February 3, 2014)

Newfoundland Power submits that there are five key issues that arise in respect of the Board’s investigation and hearing into supply issues and power outages on the Island Interconnected System which occurred in January, 2014:

- 1. What were the causes and effects of the rotating power outages which occurred in January, 2014?**
 - (a) Why were all of Hydro’s thermal generating units not available at the beginning of the winter season?
 - (b) Was the execution of the rotating power outages, including communications with customers, reasonable in the circumstances?
- 2. What were the causes of the electrical system failures which occurred from January 2-8, 2014?**
 - (a) What were the equipment failures that led to the electrical system failures from January 2-8, 2014?
 - (b) Did failures in Hydro’s protection and control equipment cause or contribute to the electrical system failures from January 2-8, 2014?
 - (c) Were the recoveries from the various electrical system failures reasonable in the circumstances?
- 3. What measures are required to ensure reliability and security of power supply to customers on the Island Interconnected System, including Newfoundland Power and its customers, in the short term?**
 - (a) What measures are required to ensure that all of Hydro’s generating units are available at the beginning of and during the winter months?
 - (b) What measures, including analysis, testing and maintenance of Hydro’s protection and control equipment, are required to ensure system reliability?

4. **What measures are required to ensure reliability and security of power supply to customers on the Island Interconnected System, including Newfoundland Power and its customers, until the Labrador in-feed and Maritime link become operational?**
5. **What measures are required to ensure reliability and security of power supply to customers on the Island Interconnected System, including Newfoundland Power and its customers, after the Labrador in-feed and Maritime link become operational?**
 - (a) Issues 4 and 5 are inter-related. It is necessary to understand the system configuration and system operations after the Labrador in-feed and Maritime link become operational in order to optimize expenditures in a manner that results in least cost reliable power over the long run.
 - (b) What additions to generation capacity on the Island Interconnected System are required to ensure reliability and security of power supply to customers?
 - (c) What back-up generation is required on the Avalon Peninsula to ensure reliability and security of power supply to customers?
 - (d) What additions to transmission capacity on the Island Interconnected System may be required to ensure reliability and security of power supply to customers?
 - (e) What is the optimal timing of construction of any additions to generation or transmission capacity?

Newfoundland Power recognizes that the five issues encompass many sub-issues such as those which the Board has identified in its letter of January 17, 2014. The definition of the issues should permit a full discussion of the five key issues set forth above. Newfoundland Power will address the issues as they are defined and established by the Board.

DATED at St. John's, Newfoundland and Labrador, this 3rd day of February, 2014.

NEWFOUNDLAND POWER INC.



Ian F. Kelly, Q.C. and Gerard Hayes
Newfoundland Power Inc.
P. O. Box 8910
55 Kenmount Road
St. John's, NL
A1B 3P6

Telephone: (709) 737-5609
Telecopier: (709) 737-2974
Internet: ghayes@newfoundlandpower.com