

IN THE MATTER OF

the *Electrical Power Control Act*, 1994,
SNL 1994, Chapter E-5.1 (the "*EPCA*")
and the *Public Utilities Act*, RSNL 1990,
Chapter P-47 (the "*Act*"), as amended;

AND

IN THE MATTER OF

the Board's Investigation and Hearing
into Supply Issues and Power Outages
on the Island Interconnected System.

**CONSUMER ADVOCATE
REQUESTS FOR INFORMATION
CA-NP-1 to CA-NP-15
Issued: July 2, 2014**

1 CA-NP-1 The response to PUB-NP-157 states “*The consistent application of*
2 *Newfoundland Power’s distribution planning activities and*
3 *processes help to ensure its customers receive a cost-effective,*
4 *uniform and high standard of electrical service throughout the*
5 *Company’s territory*”. How does NP ensure a uniform standard of
6 electrical service throughout its territory? Is it NP’s goal to target
7 equivalent levels of reliability (i.e., the same levels of SAIDI and
8 SAIFI) to every customer it supplies? If not, what criteria are used
9 to make trade-offs between “uniform” and “acceptably high”
10 standard of service?
11

12 CA-NP-2 The response to PUB-NP-157 states “*The consistent application of*
13 *Newfoundland Power’s distribution planning activities and*
14 *processes help to ensure its customers receive a cost-effective,*
15 *uniform and high standard of electrical service throughout the*
16 *Company’s territory*”. What criteria are used to determine if
17 customers are receiving “cost-effective” service?
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19 CA-NP-3 The response to PUB-NP-157 states “*The consistent application of*
20 *Newfoundland Power’s distribution planning activities and*
21 *processes help to ensure its customers receive a cost-effective,*
22 *uniform and high standard of electrical service throughout the*
23 *Company’s territory*”. What does NP consider to be a “high
24 standard of service” in its territory?
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26 CA-NP-4 Please provide a table showing for each of the past 10 years SAIDI
27 and SAIFI statistics for NP’s customers broken down by
28 generation- and transmission-related (i.e., owing to Hydro outages)
29 and distribution-related (i.e., owing to NP outages).
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1	CA-NP-5	What level of control during a system emergency does Hydro have
2		over NP-owned generation?
3		
4	CA-NP-6	What level of control does Hydro have over planned maintenance
5		scheduling of NP-owned generation?
6		
7	CA-NP-7	What documentation governs operation of NP-owned generation;
8		i.e., license, connection agreements, grid code, etc? Please file
9		copies of such documentation.
10		
11	CA-NP-8	In NP's opinion, on what basis should Hydro determine the
12		amounts of "economically available" interruptible power from
13		Industrial Customers (see page iii of Board's May 15, 2014 Interim
14		Report on Supply Issues and Power Outages on the Island
15		Interconnected System) and what process should Hydro follow to
16		gain approval of these interruptible contracts considering that the
17		2013 General Rate Application has been temporarily withdrawn?
18		
19	CA-NP-9	Has Hydro approached Newfoundland Power to determine if
20		additional interruptible load might be available under similar
21		terms, conditions and prices as that offered to current Curtailable
22		Service customers?
23		
24	CA-NP-10	Has Hydro approached Newfoundland Power to modify the terms,
25		conditions and prices offered to Curtailable Service customers in
26		order to make it a more effective resource during system
27		emergencies? What would NP recommend to make this resource
28		more effective during system emergencies?
29		
30	CA-NP-11	In NP's opinion, what process should Hydro follow to gain
31		approval of any changes to Newfoundland Power's Curtailable

1 Service rate option?

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3 CA-NP-12

In NP's opinion, would Hydro benefit from the modification/introduction of procedures granting it control during system emergencies over Island generation that it does not own? Would greater control be beneficial, and what would be involved in obtaining the necessary control over Island generation Hydro does not own?

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10 CA-NP-13

As stated in the Liberty Interim Report (page ES-2): "*Liberty believes it is time to reassess the service reliability and cost balances that underlie the decisions on what level of supply resources to make available*". What does NP use as a guide when considering decisions on cost trade-offs between improved reliability and impacts on customer costs and rates? Please provide copies of all studies undertaken by NP to determine customer willingness to pay for reliability improvements. Does NP have plans to undertake studies relating to customer willingness to pay in the future? Is NP aware of any such studies carried out elsewhere in North America?

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22 CA-NP-14

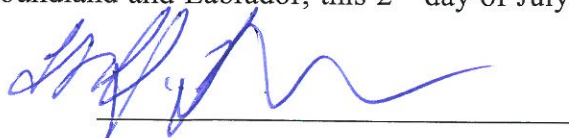
In NP's opinion, what planning and operating criteria should be employed by Hydro for supply to the Avalon Peninsula post Muskrat Falls?

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26 CA-NP-15

In reply to PUB-NP-001 (at page 293, line 27 ff) in the NP 2014 CBA Supplemental: Thermal Generator Refurbishment, NP states: "*So, the addition of Hydro's 100MW combustion turbine will not, in Newfoundland Power's view, fully address the increased near term vulnerabilities of the Island Interconnected System which were revealed by the events of the winter of 2013-2014.*" In NP's

1 assessment, what will be required in order to fully address the near
2 term vulnerabilities and please provide NP's assessment as to the
3 progress that has been made to date in meeting these requirements.
4

5 Dated at St. John's in the Province of Newfoundland and Labrador, this 2nd day of July,
6 2014.



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