



September 24, 2014

Ms. G. Cheryl Blundon  
Board of Commissioners of Public Utilities  
120 Torbay Road, P.O. Box 12040  
St. John's, NL A1A 5B2

Ladies & Gentlemen:

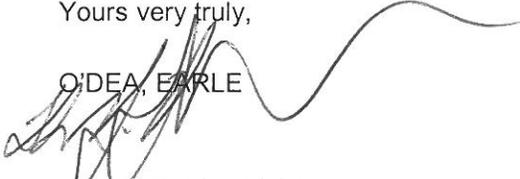
**Re: The Board's Investigation and Hearing into supply Issues and Power Outages on the Island Interconnected System – Requests for Information**

Please find enclosed one (1) original and twelve (12) copies of the Consumer Advocate's Requests for Information (on three-hole punched paper):

1. CA-NLH-57 to CA-NLH-70;
2. CA-NP-16 to CA-NP-24.

If you have any questions please feel free to contact the undersigned.

Yours very truly,



O'DEA, EARLE

THOMAS JOHNSON  
TJ/cel  
Encl.

cc: Newfoundland and Labrador Hydro  
Attention: Geoffrey P. Young

Newfoundland Power  
Attention: Gerard Hayes

Island Industrial Customers Group  
Attention: Mr. Paul Coxworthy (Stewart McKelvey)

Mr. Danny Dumaresque

Grand Riverkeeper Labrador Inc.  
Attention: Ms. Roberta Frampton

**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.

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**CONSUMER ADVOCATE  
REQUESTS FOR INFORMATION  
CA-NP-16 to CA-NP-24  
Issued: September 24, 2014**

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1 CA-NP-16 (Response to PUB-NP-22) The response states (page 4 of 7, lines 4  
2 to 8) “Critical customers included, but were not limited to,  
3 hospitals, fire and police stations, seniors’ homes, and water  
4 pumping stations. In total, 247 of Newfoundland Power’s 306  
5 distribution feeders were considered eligible for rotating power  
6 outages”. The response goes on to say (page 4 of 7, lines 11 to 16)  
7 “The list of distribution feeders considered for rotation is adjusted  
8 based on operating experience and consultation with customers  
9 and other stakeholders. For example, following the system  
10 disruption associated with the Sunnyside transformer fire on  
11 January 4<sup>th</sup>, 2014 and after communication with municipalities, the  
12 Company modified the feeder rotation list to exclude feeders  
13 serving community warming centres and fuel supply depots”.  
14 Please explain how Newfoundland Power ensures that its priorities  
15 are consistent with those of the public. Please identify and file any  
16 protocols that have been adopted for determining which customers  
17 are “critical” and how such critical customers were selected, and  
18 file any Board approvals relating to the critical customer list and  
19 the criteria used to determine which customers are “critical”.

20  
21 CA-NP-17 (Response to PUB-NP-22) Please provide a table identifying: each  
22 customer included on the current list of critical customers, the date  
23 the customer was added to the critical customer list, the reason for  
24 including the customer on the critical customer list, and the feeder  
25 that supplies the customer including the approximate geographic  
26 area served by the feeder.

27  
28 CA-NP-18 (Response to PUB-NP-22) Please provide a table summarizing the  
29 occasions over the past 20 years when Newfoundland Power has  
30 consulted customers and other stakeholders regarding the critical  
31 customer list, the method used to inform customers and other

1 stakeholders that the consultation was to take place, the forum used  
2 to consult customers and other stakeholders (i.e., town hall  
3 meetings, mail fliers, etc.), and the results of the consultations (i.e.,  
4 which critical customers were added, or deleted, from the list, the  
5 reasons for adding or deleting them from the list, and the feeders  
6 affected as a result of adding or deleting the customers from the  
7 list).

8  
9 CA-NP-19 (Response to PUB-NP-22) Following the recent outage events,  
10 how many requests has Newfoundland Power received from  
11 customers to be included on the critical customer list? Does  
12 Newfoundland Power have plans to consult the public and other  
13 stakeholders in an effort to update the critical customer list? If so,  
14 please provide details of the upcoming consultation including  
15 schedule, format and process.

16  
17 CA-NP-20 (Response to PUB-NP-22) Table 1 (page 7 of 7) summarizes the  
18 rotating outages for the January 2 – 8, 2014 time frame. Please  
19 provide supporting documentation for this table including  
20 identification of each feeder interrupted, the period of interruption,  
21 the total time of interruption, the average load interrupted on each  
22 occasion the feeder was interrupted, and the approximate  
23 geographic area served by the feeder.

24  
25 CA-NP-21 (Response to PUB-NP-22) During the January 2 – 8, 2014 power  
26 outages, please identify the feeders that were not considered for  
27 rotating outages because they serve critical customers, the critical  
28 customers that were the reason the feeder was not included in the  
29 rotating power outages, and the approximate geographic area  
30 served by the feeder excluded from the rotating outages. If any  
31 feeders were included in the rotating outages, but received

1 preferential treatment, for example, a feeder was subjected to  
2 shorter outages because it served a critical customer, please  
3 identify the occasions, the feeders and critical customer(s)  
4 involved, and provide an explanation of why the feeder received  
5 preferential treatment and identify the approximate geographic  
6 area served by the feeder.

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8 CA-NP-22 (Response to PUB-NP-22) Who within Newfoundland Power is  
9 tasked with creating the critical customer list, what are their  
10 qualifications and how were they selected?

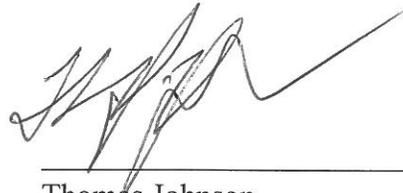
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12 CA-NP-23 (Response to CA-NP-13) Newfoundland Power states (lines 26 to  
13 28) "*Newfoundland Power has not conducted studies to determine  
14 customer willingness to pay for reliability improvements nor is the  
15 Company aware of any such studies*". Is Newfoundland Power  
16 aware of the June 2009 report undertaken by Ernest Orlando  
17 Lawrence Berkeley National Laboratory entitled "*Estimated Value  
18 of Service Reliability for Electric Utility Customers in the United  
19 States*" prepared for the U.S. Department of Energy (see website:  
20 <http://certs.lbl.gov/pdf/lbnl-2132e.pdf>)? Does Newfoundland  
21 Power believe that the conduct of a similar study specific to  
22 electricity consumers of this Province would provide useful  
23 information in addressing Liberty's statement (see Liberty's  
24 Interim Report, page ES-2): "*Liberty believes it is time to reassess  
25 the service reliability and cost balances that underlie the decisions  
26 on what level of supply resources to make available*"? If not, what  
27 does Newfoundland Power recommend that Hydro use to balance  
28 costs with the level of supply resources to make available to  
29 consumers going forward?

30  
31 CA-NP-24 (Response to CA-NP-15) The response indicates that

1 Newfoundland Power believes that the 100 MW combustion  
2 turbine will not fully address the increased near term  
3 vulnerabilities on the Island, and goes on to say what it believes  
4 needs to be done. The response to CA-NP-4 indicates that with the  
5 exception of 2013 (and possibly 2014), Hydro's reliability  
6 performance has been considerably better than that of  
7 Newfoundland Power. Why has Newfoundland Power's reliability  
8 performance been poorer than Hydro's and what is Newfoundland  
9 Power proposing to address the near term vulnerabilities on its own  
10 system?

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13 Dated at St. John's in the Province of Newfoundland and Labrador, this 24<sup>th</sup> day of  
14 September, 2014.

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