

WHENEVER. WHEREVER.
We'll be there.



HAND DELIVERED

March 8, 2017

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: The Board's Investigation and Hearing into Supply Issues and Power Outages on the
Island Interconnected System - Phase Two – Requests for Information**

Please find enclosed the original and 12 copies of Newfoundland Power's Requests for Information NP-PUB-027 to NP-PUB-028 in relation to the above noted Application.

For convenience, the 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,

A handwritten signature in blue ink, appearing to read "Gerard Hayes".

Gerard Hayes
Senior Counsel

Enclosures

c. Tracey Pennell
Newfoundland and Labrador Hydro

Paul Coxworthy
Stewart McKelvey Stirling Scales

Larry Bartlett
Teck Resources Ltd.

Dennis Browne, QC
Browne Fitzgerald Morgan Avis

Roberta Frampton Benefiel
Grand Riverkeeper Labrador, Inc.

Danny Dumaresque

Newfoundland Power Inc.

55 Kenmount Road • P.O. Box 8910 • St. John's, NL A1B 3P6

PHONE (709) 737-5609 • FAX (709) 737-2974 • ghayes@newfoundlandpower.com

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.

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

NP-PUB-027 to NP-PUB-028

March 8, 2017

Requests for Information

NP-PUB-027

Reference: *Evaluation of Pre-Muskrat Falls Supply Needs and Hydro's November 30, 2016 Energy Supply Risk Assessment Final Report*, The Liberty Consulting Group, Page 28.

"If the 110 MW recall power is available, and we assume it is, the delay issue is less threatening. We will then be in a mode of waiting to see if the declining thermal reliability and increasing load growth (if they happen) can catch up to and surpass that 110 MW before Muskrat Falls is in service (presumably 2022-23). If the recall power becomes in doubt, all bets are off and the Muskrat Falls delays rise to the highest threat level."

In Liberty's opinion, when should availability of the 110 MW of recall power be confirmed in order to avoid the "all bets are off" scenario referred to in the cited passage?

NP-PUB-028

Reference: *Evaluation of Pre-Muskrat Falls Supply Needs and Hydro's November 30, 2016 Energy Supply Risk Assessment Final Report*, The Liberty Consulting Group, Page 28.

"If the 110 MW recall power is available, and we assume it is, the delay issue is less threatening. We will then be in a mode of waiting to see if the declining thermal reliability and increasing load growth (if they happen) can catch up to and surpass that 110 MW before Muskrat Falls is in service (presumably 2022-23). If the recall power becomes in doubt, all bets are off and the Muskrat Falls delays rise to the highest threat level."

In Liberty's opinion, what mitigating steps should be undertaken if timely confirmation of the availability of the 100 MW of recall power does not occur?

RESPECTFULLY SUBMITTED at St. John's, Newfoundland and Labrador, this 8th day of March, 2017.



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