



Public Utilities Board

NEWFOUNDLAND & LABRADOR

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2024-11-08

Ms. Shirley Walsh
Senior Legal Counsel, Regulatory
Newfoundland and Labrador Hydro
P.O. Box 12400
Hydro Place, Columbus Drive
St. John's, NL A1B 4K7

Dear Ms. Walsh:

Re: Newfoundland and Labrador Hydro - Reliability and Resource Adequacy Study Review - To NLH - Requests for Information

Enclosed are Requests for Information PUB-NLH-324 to PUB-NLH-340 regarding the above-noted application.

If you have any questions, please do not hesitate to contact the Board's counsel, Ms. Maureen Greene, KC, by email mgreene@pub.nl.ca or telephone (709)726-3175.

Sincerely,

Jo-Anne Galarneau
Board Secretary

JG/cj
Enclosure

ecc **Newfoundland and Labrador Hydro**
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Senwung Luk, E-mail: sluk@oktlaw.com
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1 **IN THE MATTER OF**
2 the **Electrical Power Control Act, 1994**,
3 SNL 1994, Chapter E-5.1 (the “**EPCA**”)
4 and the **Public Utilities Act**, RSNL 1990,
5 Chapter P-47 (the “**Act**”), as amended, and
6 regulations thereunder; and
7
8 **IN THE MATTER OF** Newfoundland and
9 Labrador Hydro’s Reliability and Supply
10 Adequacy Study.

**PUBLIC UTILITIES BOARD
REQUESTS FOR INFORMATION**

**PUB-NLH-324 to PUB-NLH-340
Issued: November 8, 2024**

1 **Newfoundland and Labrador Hydro - 2024 Resource Adequacy Plan, Filed July 9, 2024**

2

- 3 **PUB-NLH-324** Please refer to Hydro’s “2024 Resource Adequacy Plan: Technical Conference
 4 #4: Expansion Plan, Insights, and Next Steps,” dated October 29, 2024, at slide
 5 33. For each “model run” and “sensitivity” identified on this slide, please provide
 6 the data listed below for all assets available to PLEXOS (including existing Hydro
 7 assets by generating unit and potential expansion assets). Please provide the
 8 data in Excel format, with all units of measurement clearly indicated, for the
 9 entire study period.
- 10 a. Capacity (MW) (by season, if applicable)
 - 11 b. Firm Capacity (MW)
 - 12 c. Maximum Generation (MW)
 - 13 d. Minimum Stable Generation (MW)
 - 14 e. Heat rate (GJ/MWh or MMBtu/MWh)
 - 15 f. Minimum up time
 - 16 g. Minimum down time
 - 17 h. Failure parameters (such as rate, frequency)
 - 18 i. Maintenance parameters (such as rate, frequency)
 - 19 j. Ramp rate (MW/minute)
 - 20 k. Hourly dependable capacity shape (by season, if applicable, such as for
 21 wind resources¹)
 - 22 l. Capital cost
 - 23 m. Sustaining capital cost (\$/year)
 - 24 n. Variable O&M cost (\$/MWh)
 - 25 o. Fixed O&M cost (\$/MW or \$/kW)
 - 26 p. Marginal loss factor (%)
 - 27 q. Retirement/decommissioning cost (\$)
 - 28 r. Terminal/salvage value (\$)
 - 29 s. Asset life (years/date)
 - 30 t. Fuel type
 - 31 u. Fuel cost (by year)
 - 32 v. Marginal cost (\$/MWh)
 - 33 w. Start-up costs (\$/start) (please distinguish between hot/warm/cold starts,
 34 if applicable)
 - 35 x. Cycling costs
 - 36 y. Emissions rates
 - 37 z. Emissions costs
 - 38 aa. Round trip efficiency (for battery energy storage projects)
 - 39 bb. Duration (for battery energy storage projects)

¹ See 2024 Resource Adequacy Plan, Filed July 9, 2024, Appendix B, page 31 of 57, lines 17 to 19.

- 1 **PUB-NLH-325** Please refer to Hydro’s “2024 Resource Adequacy Plan: Technical Conference
2 #4: Expansion Plan, Insights, and Next Steps,” dated October 29, 2024, at slide
3 33. For each “model run” and “sensitivity” identified on this slide, and with all
4 units of measurement clearly indicated, please provide for all assets available to
5 PLEXOS (including existing Hydro assets and potential expansion assets) and in
6 Excel format, for the entire study period:
- 7 a. Total installed capacity, by year
 - 8 b. Selected resources’ MW, by year
 - 9 c. Annual generation (GWh, by year)
 - 10 d. Annual fuel burn (Btu, by year)
 - 11 e. Capacity factor (by year)
 - 12 f. Availability factor (by year)
 - 13 g. Average duration (hours)
 - 14 h. Fixed costs (by year)
 - 15 i. Variable costs (by year)
 - 16 j. Forced outage hours (by year)
 - 17 k. Planned outage hours (by year)
 - 18 l. Maintenance outage hours (by year)
 - 19 m. Hourly operating reserve contributions (by reserve product, e.g., 30-
20 minute and 10-minute reserves, regulating reserves, etc.)
- 21
- 22 **PUB-NLH-326** Please refer to Hydro’s “2024 Resource Adequacy Plan: Technical Conference
23 #4: Expansion Plan, Insights, and Next Steps,” dated October 29, 2024, at slide
24 33. For each “model run” and “sensitivity” identified on this slide, and with all
25 units of measurement clearly indicated, please provide in Excel format and for
26 the entire study period:
- 27 a. Loss of Load Hours (by year)
 - 28 b. Loss of Load Expectation (by year)
 - 29 c. Expected Unserved Energy (by year)
 - 30 d. Overgeneration (by year)
 - 31 e. Curtailed energy (by year)
 - 32 f. Hourly operating reserves (by reserve product, e.g., 30-minute and 10-
33 minute reserves, regulating reserves, etc.)
 - 34 g. Hourly operating reserve requirements (by reserve product, e.g., 30-
35 minute and 10-minute reserves, regulating reserves, etc.)
 - 36 h. Total Fixed Cost (by year)
 - 37 i. Total Operating/Variable Cost (by year)
 - 38 j. Total Cost (by year)
 - 39 k. NPV Total Cost (by year)
 - 40 l. Incremental transmission expansion costs (by year)
 - 41 m. Reserve Margin (by year)
 - 42 n. Planning horizon (years)
 - 43 o. Hourly load shapes
 - 44 p. Years modeled (including identification of representative years)

- 1 q. Fuel price forecasts
- 2 r. Transmission constraints
- 3 s. LIL hourly available capacity (MW)
- 4 t. LIL hourly flows (MW)
- 5 u. Transmission losses
- 6 v. Hourly imports (via Quebec)
- 7 w. Hourly imports (via Nova Scotia)
- 8 x. Hourly exports (via Quebec)
- 9 y. Hourly exports (via Nova Scotia) (as broken down between Nova Scotia
- 10 Block Energy, Energy Access Agreement Energy, and other bilateral
- 11 transactions)
- 12 z. Spillage (by year)
- 13 aa. Fuel burn off volumes
- 14 bb. Fuel burn off costs

15

16 **PUB-NLH-327** With respect to model results related to reliability statistics – i.e., loss-of-load

17 hours, loss-of-load-expectation, and unserved energy – and considering the fact

18 that system commitment and dispatch simulations typically report quantities of

19 unserved energy that may not reflect any reliability deficiency, but rather

20 inherent limitations of the simulation:

- 21 a. Please describe how such reliability-related statistics are extracted or
- 22 derived from model outputs.
- 23 b. Does Hydro monitor or benchmark such reliability-related model outputs
- 24 against expectations? For example, our understanding is that a 2.8 LOLH
- 25 target is used to derive a planning reserve margin that is then incorporated
- 26 in the system modeling. Does Hydro evaluate whether loss of load hours
- 27 explicit or implicit in the system model outputs correspond appropriately
- 28 to the 2.8 LOLH target?
- 29 c. Does Hydro consider there to be a base level of unserved energy inherent
- 30 to model limitations, with higher levels relevant to true reliability issues?
- 31 Please explain.

32

33 **PUB-NLH-328** Please refer to the Resource Adequacy Plan, Appendix C, Section 3.0. For the

34 firm energy analysis, please provide, in Excel format:

- 35 a. All model outputs/results
- 36 b. All model assumptions
- 37 c. All model inputs
- 38 d. Hourly firm energy demand
- 39 e. Hourly firm energy supply
- 40 f. Hourly firm energy, by supply resource
- 41 g. Hourly energy profile, by supply resource, if different from (f)
- 42 h. Hourly firm energy of the LIL
- 43 i. Hourly energy profile of the LIL, if different from (h)
- 44 j. Hourly firm energy imports

- 1 k. Hourly firm energy exports
 2 l. Hourly
 3 m. Spillage (hourly, if available; otherwise, by year)
 4 n. Hourly wind curtailments
 5 o. Time horizon of study period
 6 p. Transmission losses
 7 q. Generation forced outage rates
 8
- 9 **PUB-NLH-329** Please refer to Resource Adequacy Plan Filing, Appendix B, page 15 of 57, line 6.
 10 Please provide for the Transmission Model, in Excel format:
 11 a. Inputs
 12 b. Assumptions
 13 c. Outputs/Results
 14
- 15 **PUB-NLH-330** Please refer to Resource Adequacy Plan Filing, Appendix B, page 15 of 57, lines
 16 7-8. Please provide for the Long-Term Financial Model, in Excel format:
 17 a. Inputs
 18 b. Assumptions
 19 c. Outputs/Results
 20
- 21 **PUB-NLH-331** Please confirm that battery energy storage is selected in all capacity expansion
 22 model runs where its assumed ELCC is 60% or greater. If not confirmed, please
 23 explain.
 24
- 25 **PUB-NLH-332** Please explain in detail why Hydro decided to pursue at this time the Minimum
 26 Investment Required Expansion Plan as defined in the 2024 Resource Adequacy
 27 Plan rather than the Reference Plan.
 28
- 29 **PUB-NLH-333** Please explain in detail what the implications of the supply options
 30 recommended in the Minimum Investment Required Expansion Plan are for
 31 potential supply options in the Reference Plan and how selection of the
 32 Minimum Investment Required Expansion Plan supply options impacts the
 33 selection and timing of supply options in the Reference Plan.
 34
- 35 **PUB-NLH-334** Please explain in detail the actions that Hydro is taking to ensure readiness to
 36 pursue the Reference Plan expansion requirements and how it will monitor and
 37 evaluate the need for and timing of additional generation requirements
 38 assuming the approval by the Board of the Minimum Investment Required
 39 Expansion Plan. In the response provide a schedule that lists all key activities and
 40 expected completion dates, including the date for the next update to the
 41 Resource Adequacy Plan.
 42
- 43 **PUB-NLH-335** Please list all ongoing and planned studies and analyses Hydro is undertaking or
 44 will undertake to support its applications for approval of supply options for the

- 1 Minimum Investment Required Expansion Plan and the Reference Case. In the
 2 response describe the scope of work for each study and analysis and the
 3 expected date for completion.
 4
- 5 **PUB-NLH-336** Please state the expected filing date for the application for approval of the
 6 supply options recommended in the Minimum Investment Required Expansion
 7 Plan.
 8
- 9 **PUB-NLH-337** One of the assumptions underlying Hydro's system planning criteria and
 10 methodology for the Minimum Investment Required Expansion Plan is an
 11 Equivalent Forced Outage Rate of 1% for the Labrador Island Link. Please explain
 12 how this assumption was selected and the implications for reliability and
 13 resource adequacy for the Island Interconnected system if the actual outage rate
 14 is higher or lower.
 15
- 16 **PUB-NLH-338** Please refer to Hydro's 2024 Resource Adequacy Plan: Technical Conference #1:
 17 Load Forecast/Reliability Planning Criteria, dated September 17, 2024 at slide
 18 55. Please explain how in the LIL shortfall assessment Hydro determined the
 19 level of customer interruption that it considers appropriate and how such
 20 interruption would be managed.
 21
- 22 **PUB-NLH-339** Please explain why a battery energy storage system has been excluded as a
 23 potential supply option for the Minimum Investment Required Expansion Plan.
 24
- 25 **PUB-NLH-340** Please explain any fuel supply constraints that may arise with respect to the
 26 selection of a combustion turbine (CT) as a supply option and how Hydro
 27 satisfied itself that fuel supply is not an impediment to the selection of a 150
 28 MW CT in the Minimum Investment Required Expansion Plan.

DATED at St. John's, Newfoundland and Labrador, this 8th day of November 2024.

BOARD OF COMMISSIONERS OF PUBLIC UTILITIES

Per


 Jo-Anne Galarneau
 Board Secretary