



NEWFOUNDLAND AND LABRADOR

BOARD OF COMMISSIONERS OF PUBLIC UTILITIES

120 Torbay Road, P.O. Box 21040, St. John's, Newfoundland and Labrador, Canada, A1A 5B2

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2022-10-14

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 - 2023 Capital Budget Application
Requests for Information**

Enclosed are Requests for Information PUB-NLH-027 to PUB-NLH-030 regarding the above-noted application.

If you have any questions, please do not hesitate to contact the Board's Legal Counsel, Ms. Jacqui Glynn, by email, jglynn@pub.nl.ca or telephone (709) 726-6781.

Sincerely,

Cheryl Blundon
Board Secretary

CB/cj
Enclosure

ecc **Newfoundland and Labrador Hydro**
NLH Regulatory, E-mail: NLHRegulatory@nlh.nl.ca
Newfoundland Power Inc.
Dominic Foley, E-mail: dfoley@newfoundlandpower.com
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Senwung Luk, E-mail: sluk@oktlaw.com
Josh Favel, E-mail: jfavel@oktlaw.com

1 **IN THE MATTER OF the Electrical Power**
2 **Control Act, 1994**, SNL 1994, Chapter E-5.1
3 (the “**EPCA**”) and the **Public Utilities Act**, RSNL
4 1990, Chapter P-47 (the “**Act**”), as amended,
5 and regulations thereunder; and
6

7 **IN THE MATTER OF** an Application by
8 Newfoundland and Labrador Hydro for an
9 Order approving:

- 10 i) its capital budget for 2023, pursuant to
11 section 41(1) of the **Act**;
12 ii) its proposed capital purchases and construction
13 projects for 2023 in excess of \$50,000, pursuant
14 to section 41(3)(a) of the **Act**; and
15 iii) for an Order pursuant to section 78 of the **Act**,
16 fixing and determining its average rate base for
17 2021.

**PUBLIC UTILITIES BOARD
REQUESTS FOR INFORMATION**

PUB-NLH-027 to PUB-NLH-030

Issued: October 14, 2022

- 1 **PUB-NLH-027** *Program 3 – Terminal Station Renewal Program (2023-2024)* (page 10, line 9)
 2
 3 Hydro stated it does not currently record transformer outage statistics however,
 4 in response to PUB-NLH-016 Hydro corrected this statement and advised that it
 5 does record power outage statistics and provided details on outages since 2017.
 6
 7 In response to CA-NLH-046, page 2, lines 13-14, Hydro states “Hydro also notes
 8 that power transformer outage statistics are not recorded by Hydro to support
 9 the Historical Reliability requirement.”
 10
 11 Please reconcile these two statements.
 12
 13 **PUB-NLH-028** In response to PUB-NLH-024, Hydro states that it has not conferred with other
 14 Canadian utilities on the management of mobile devices. Please explain the
 15 rationale for not investigating the replacement policy of other Canadian utilities
 16 to ensure whether Hydro’s replacement policy is in line and consistent.
 17
 18 **PUB-NLH-029** In response to CA-NLH-069, Hydro references a 2018 U.S. Utility-Scale
 19 Photovoltaics-Plus-Energy Storage System Costs Benchmark report that
 20 indicated that “most storage technology is limited to 10 hours in duration and
 21 none exceed average energy storage duration of 100 hours.”
 22
 23 Has Hydro conducted more recent research to determine to what extent storage
 24 technology has progressed in the four years since the report was published? If
 25 so, please provide any updated analysis. If not, please outline the rationale for
 26 not conducting more recent research.
 27
 28 **PUB-NLH-030** In response to CA-NLH-092, page 4, line 15 references the Off-Grid Utility
 29 Association. Please provide additional information on the association including
 30 a uniform resource locator, the member organizations of the association, and a
 31 description of the types of research and analyses undertaken by the association.

DATED at St. John’s, Newfoundland and Labrador, this 14th day of October, 2022.

BOARD OF COMMISSIONERS OF PUBLIC UTILITIES

Per


 Cheryl Blundon
 Board Secretary