

Office of the Consumer Advocate

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November 6, 2017

Via Courier

Board of Commissions of Public Utilities
120 Torbay Road, P.O. Box 2140
St. John's, NL A1A 5B2

Attention: **G. Cheryl Blundon, Director of
Corporate Services / Board Secretary**

Dear Ms. Blundon:

RE: Newfoundland and Labrador Hydro - 2017 General Rate Application

Further to the above-captioned, enclosed please find enclosed the original and thirteen (13) copies of the Consumer Advocate's Requests for Information numbered CA-NLH-161 to CA-NLH-224.

Yours truly,



Dennis Browne, Q.C.

Encl.
/bb

cc **Newfoundland & Labrador Hydro**
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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 a General Rate
Application by Newfoundland and Labrador
Hydro to establish customer electricity rates
for 2018 and 2019.

**CONSUMER ADVOCATE
REQUESTS FOR INFORMATION**

CA-NLH-161 to CA-NLH-224

Issued: November 6, 2017

1 **Rates and Regulation**

2
3 CA-NLH-161 Please provide a table listing each of Hydro's upcoming regulatory
4 activities (i.e., this 2017 GRA, the 2019 GRA, the cost of service study,
5 Outage Inquiry, FERC open-access transmission tariff, etc.) along with a
6 schedule showing the filing date and the date when a decision is anticipated.
7 Please include not only regulatory activities in NL, but also other
8 jurisdictions such as FERC, Quebec, and Nova Scotia, in which Hydro
9 would be a participant, either directly or indirectly.

10
11 CA-NLH-162 Please provide a table listing each of Hydro's upcoming regulatory
12 activities both in and outside the Province, but on the basis of Hydro's
13 priorities. The table should reflect Hydro's priorities only.

14
15 CA-NLH-163 (Reference response to CA-NLH-69) Please provide Table 1-1 with an
16 additional column showing the proposed 2019 TY increase relative to rates
17 effective July 1, 2017.

18
19 CA-NLH-164 (Reference response to NP-NLH-165) Is it accurate to say that Table 1
20 reflects Hydro's best forecast of rate increases from July 2017 through
21 January 2019? Please confirm that from July 2017 through January 2018,
22 Newfoundland Power is forecast to receive a cumulative rate increase of
23 50.8% and the Island Industrial Customers are forecast to receive a
24 cumulative rate increase of 20.3%. Please provide the same table with an
25 additional column showing the forecast rate increase for January 2021
26 following commissioning of Muskrat Falls when Island Interconnected
27 System average rates are expected to increase to 22.89 cents/kWh (plus
28 HST).

29
30 **Cost of Service**

31
32 CA-NLH-165 (Reference response to CA-NLH-108) How will the capacity assistance
33 agreements provide value once the LIL and ML links are in service? Please
34 provide a table comparing total capacity supply availability (generation
35 capacity, capacity available over the LIL and ML links, capacity assistance,
36 reserve requirement, etc.) to peak demand on the Island Interconnected
37 System in 2019.

- 1 CA-NLH-166 (Reference Hydro's 2018 Capital Budget Application, Volume 2, Tab 13 –
2 Muskrat Falls to Happy Valley – Interconnection) How have the costs of
3 this project been allocated to customers in the cost of service study and what
4 is the rate impact on these customers in the 2018 and 2019 Test Years?
5
- 6 CA-NLH-167 (Reference Volume II, Exhibit 13) Is Hydro's cost of service expert aware
7 of any jurisdictions where the cost of service has been based on a fictitious
8 future that expected to significantly over-collect costs? If so, please provide
9 a list of such jurisdictions and provide an explanation of how the case was
10 decided.
11
- 12 CA-NLH-168 (Reference response to PUB-NLH-107) What is Hydro's best estimate of
13 Holyrood capacity factor, fuel costs and fuel conversion efficiency in 2019
14 relative to those proposed in the 2019 test year given that Units 1 and 2 at
15 Holyrood will be operating in standby mode and Unit 3 as a synchronous
16 condenser beginning in the second quarter of 2018 (see response to PUB-
17 NLH-68) owing to the availability of off-island purchases?
18
- 19 CA-NLH-169 If the Board ordered Hydro to file a cost of service study based on its best
20 forecast of costs in the 2019 test year incorporating off-island purchases,
21 would Hydro propose to classify Holyrood costs as capacity-related and the
22 off-island purchase costs as energy-related? If not, what would Hydro
23 propose? What other key assumptions would have to be made with respect
24 to allocations in the cost of service study under this scenario?
25

26 **Transmission, Open Access and Off-Island Purchases**
27

- 28 CA-NLH-170 (Reference response to CA-NLH-41) It is stated that Hydro has had
29 discussions with Government about OC2013-345. Why did Hydro have
30 such discussions, and what was the outcome?
31
- 32 CA-NLH-171 (Reference report entitled *Operational Studies: Maritime Link Only*,
33 September 8, 2017) According to Figure 1-2 and Table 1-2, exports over
34 the Maritime Link will be limited to 85 MW when at least one Holyrood
35 unit is on-line, and 120 MW when Holyrood is used as a synchronous
36 condenser. It is understood that these figures apply to the time frame prior
37 to the in-service date of the LIL, and assume the Soldiers Pond synchronous
38 condensers are not on-line (page 1, 1st paragraph). What are the
39 repercussions of this limitation in terms of costs and reliability? What will

1 be the export limit over the ML following the in-service date of LIL with
2 and without the Soldiers Pond synchronous condensers on-line, and what is
3 driving the change in export limits between the two scenarios with and
4 without the LIL?

5
6 CA-NLH-172 (Reference response to CA-NLH-40) Is it correct to say that CBPP will be
7 able to avail of Hydro's transmission, but will not be allowed to use the
8 transmission to purchase electricity to supply its own needs, or to sell its
9 generation to other island customers? Is it accurate to say that CBPP has
10 open access to the transmission system, but does not have the right to use
11 the transmission system? If this is not the case, please provide examples of
12 how CBPP might actually use the transmission system; i.e., could CBPP
13 sell its generation outside the Province?

14
15 CA-NLH-173 (Reference response to IOC-NLH-9) Will any entity other than Hydro and
16 Nalcor have both access to the Province's transmission system and the right
17 to use the transmission system to transport electricity in the Province?
18 Please provide examples of other entities, if any, that might fit into this
19 category.

20
21 CA-NLH-174 (Reference response to CA-NLH-34) Can Nalcor purchase power in the
22 United States and bring it to the Island over the ML before FERC has
23 approved Hydro's open access transmission tariff? When does Hydro
24 expect to file and receive approval from FERC of its open access
25 transmission tariff? Please provide an overview of FERC's review process
26 and how stakeholders might participate.

27
28 CA-NLH-175 (Reference response to LAB-NLH-20) It is stated "*The implementation of*
29 *an Open Access regime will not adversely affect native load customers*
30 *primarily because Hydro will only pay its proportional share of the revenue*
31 *requirement based on transmission usage.*" How will the proportional share
32 be calculated? Please provide a numerical example.

33
34 CA-NLH-176 (Reference response to CA-NLH-64) It is stated "*Hydro is committed to*
35 *ensuring the provision of least-cost reliable service for customers. Hydro*
36 *will develop an appropriate review process to ensure activities carried out*
37 *by Nalcor Energy Marketing on Hydro's behalf are to the benefit of*
38 *Hydro's customers. Hydro will work with the Board to develop appropriate*
39 *reporting mechanisms around the same.*" Why didn't Hydro submit a

1 review process and reporting mechanism as part of this Application given
2 that the ML is forecast to be in service in two months and that Nalcor
3 Energy Marketing is already in negotiations for off-island power
4 purchases? Is it reasonable for Hydro to expect the Board and the Parties to
5 support the proposed Off-Island Purchases Deferral Account that is
6 expected to accumulate significant amounts of money without a process in
7 place to ensure that off-island purchases are being procured at lowest cost
8 and providing maximum benefit to customers?
9

10 CA-NLH-177 (Reference response to CA-NLH-50) Please confirm that the LIL/LTA
11 transmission costs of \$27.3 million in 2018 and \$52.9 million in 2019 will
12 be incurred to transport purchases costing \$1.016 million in 2018 and \$1.68
13 million in 2019. Please translate these transmission costs into a cents/kWh
14 charge and compare it to the total cost of network transmission on the Island
15 Interconnected System in \$millions and cents/kWh (based on energy
16 delivered by the network transmission system) for both 2018 and 2019.
17 Does Hydro consider the LIL/LTA transmission cost to be reasonable
18 considering that it recovers only O&M and none of the capital cost of the
19 transmission (see PUB-NLH-18)?
20

21 CA-NLH-178 (Reference response to CA-NLH-50) If Hydro does not use LIL/LTA
22 transmission for purchases to supply Island load in 2018 and 2019, what
23 costs will Nalcor incur for operating these transmission facilities and what
24 revenues will Nalcor receive in 2018 and 2019 prior to the commissioning
25 of Muskrat Falls?
26

27 CA-NLH-179 (Reference response to PUB-NLH-19) The response indicates that Hydro
28 is not forecasting any sales of power and energy to off-island purchasers in
29 2018 and 2019. Why not? Does Hydro not have excess capacity in the
30 summer months sitting on standby when many summer peaking utilities in
31 the United States may need capacity?
32

33 CA-NLH-180 (Reference response to CA-NLH-34) The response indicates that Nalcor is
34 not required to pay for transport of power and energy on the Maritime Link,
35 but other entities might be so required. Specifically, what transmission
36 facilities on the Island are included as part of the Maritime Link that Nalcor
37 would be allowed to use without incurring a transmission charge and who
38 owns these facilities?

- 1 CA-NLH-181 (Reference response to CA-NLH-34) The response indicates that Nalcor is
2 not required to pay for transport of power and energy on the Maritime Link,
3 but other entities might be so required. Please identify which of the
4 following facilities will be included in Hydro's open access transmission
5 tariff: Labrador network transmission, LTA, LIL, Island network
6 transmission and the ML. For those facilities that are not included in
7 Hydro's open access transmission tariff, please explain who owns these
8 facilities, who will be required to pay for them and how.
9
- 10 CA-NLH-182 (Reference response to CA-NLH-34) The response indicates that Nalcor is
11 not required to pay for transport of power and energy on the Maritime Link,
12 but other entities might be so required. Will there be separate charges for
13 use of the ML and the Province's grid under the open access tariff? If so,
14 would this constitute rate pancaking and be in violation of FERC
15 requirements? Further, given that Nalcor has free access to ML
16 transmission, does Nalcor have an unfair competitive advantage in the
17 marketplace over other power marketers and would this violate FERC open
18 access requirements?
19
- 20 CA-NLH-183 (Reference response to CA-NLH-34) The response indicates that Nalcor is
21 not required to pay for transport of power and energy on the Maritime Link,
22 but other entities might be so required. Why is Nalcor not required to pay
23 for use of the ML; i.e., is the cost of the ML part of the cost of the Muskrat
24 Falls project? Will Island Interconnected Customers be required to pay for
25 the ML, either explicitly or implicitly? If so, would Island Interconnected
26 Customers potentially be required to pay for the costs of the ML twice if
27 Hydro were to purchase power over the ML from a marketer other than
28 Nalcor Energy Marketing?
29
- 30 CA-NLH-184 (Reference response to CA-NLH-64) It is stated: "*Hydro will provide*
31 *Nalcor Energy Marketing with guidelines regarding Hydro's required*
32 *dispatch of on-island resources, including Holyrood Thermal Generating*
33 *Station, based on a number of factors including reliability requirements,*
34 *forecast customer requirements, and the safe and reliable operation of*
35 *Hydro's generating assets. With this information, Nalcor Energy Marketing*
36 *will then optimize the supply portfolio and identify opportunities where*
37 *thermal generation can be minimized to provide savings for Hydro's*
38 *customers. Hydro will provide oversight regarding processes implemented*
39 *and the resultant production plans.*" This approach seems to be overly

1 complicated and inefficient with Hydro determining need, Nalcor procuring
 2 energy to meet this need, and Hydro providing oversight and review to
 3 ensure the procurement meets its defined need. Has Hydro considered an
 4 alternative procurement process whereby it would determine need, issue a
 5 request for proposals to meet this need, and then evaluate submissions to
 6 determine which best meets the needs at lowest cost? Would this not be a
 7 more efficient and less costly procurement process with increased
 8 transparency, and as long as the process received widespread distribution,
 9 provide assurance to the Board that the procurement process is meeting the
 10 needs of consumers at least cost? Isn't one of the primary benefits of
 11 competition and open access that utilities no longer have to enter into
 12 laborious and inefficient one-on-one negotiations for power?

13
 14 **Deferral Account**

15
 16 CA-NLH-185 (Reference response to CA-NLH-47) With regard to establishment and use
 17 of the Off-Island Purchases Deferral Account, it is stated "*Hydro is open to*
 18 *discussions on alternatives to its proposal*". How, when and in what format
 19 does Hydro propose that such discussions on an alternative means for rate
 20 mitigation take place?

21
 22 CA-NLH-186 (Reference response to CA-NLH-6) The response indicates that Hydro
 23 "*advised the Provincial Government and Nalcor of its deferral account*
 24 *proposal*". It does not indicate that either party agreed to the proposal. Is it
 25 accurate to say that neither Nalcor nor the Government has endorsed
 26 Hydro's proposed rate mitigation mechanism that significantly over-
 27 collects revenues in the years leading up to Muskrat Falls?

28
 29 CA-NLH-187 (Reference response to CA-NLH-8) The response indicates that "*Hydro has*
 30 *been informed that rate mitigation actions or plans beyond what Hydro has*
 31 *proposed in the 2017 GRA will be a policy decision of government*". Given
 32 that rate mitigation actions or plans will be a Government policy decision,
 33 what does Hydro expect the Board to do with respect to rate mitigation
 34 when it appears that any decision it might make could be superseded by
 35 Government?

36
 37 CA-NLH-188 Please confirm that Hydro is proposing that the Board approve rates that
 38 reflect Hydro's best forecast of the cost of supply to Labrador
 39 Interconnected Customers and that will over-collect Hydro's best estimate

1 of the cost of supply to Newfoundland Power and its customers. Please
2 provide an analysis of the repercussions of this approach with respect to the
3 recovery of the rural deficit amounts from these customer classes.
4

5 CA-NLH-189 Please confirm that Hydro is proposing that the Board approve rates that
6 will over-collect Hydro's best estimate of the cost of supply to
7 Newfoundland Power and its customers and provide an analysis of the
8 repercussions of this approach with respect to the rates for the Rural and
9 Isolated Customers in the Province whose rates are tied to the rates of
10 Newfoundland Power's customers. Will the rates for Rural and Isolated
11 Customers also over-collect, and if so, how does Hydro propose that these
12 customers be reimbursed? Further, if the rates for Rural and Isolated
13 Customers over-collect, would the rural deficit amount require adjustment,
14 and if so, would it be necessary to claw back rural deficit shortfall amounts
15 from Newfoundland Power customers and Labrador Interconnected
16 Customers?
17

18 CA-NLH-190 What guidance can Hydro provide to the Board on how to allocate the
19 proceeds of the proposed Off-Island Purchases Deferral Account to
20 customer classes? To ensure fairness, would Hydro go back and conduct
21 cost of service studies to determine the actual cost of supply to each
22 customer class in 2018 and 2019, and allocate the proceeds of the Off-Island
23 Purchases Deferral Account accordingly? If so, might this be deemed
24 retroactive ratemaking? Does Hydro support retroactive ratemaking, and
25 has the Board ever approved retroactive ratemaking in this Province?
26

27 CA-NLH-191 (Reference response to PUB-NLH-13) Please identify potential scenarios
28 under which there may be losses from purchases included in the proposed
29 Off-Island Purchases Deferral Account.
30

31 CA-NLH-192 (Reference response to CA-NLH-42) It is stated: "*Hydro considers it fair*
32 *to set aside the savings from off-island purchases that are achieved during*
33 *the pre-commissioning period in a deferral account and use those savings*
34 *to help mitigate the increase in rates required to provide recovery of the*
35 *Muskrat Falls Project costs."* Is this position based on discussions with
36 customers? Please provide all communications with customers that Hydro
37 has had in relation to over-collecting costs over the next 3 years and using
38 the proceeds to off-set future rate increases.

1 CA-NLH-193 (Reference response to CA-NLH-56) How much money does Hydro expect
 2 will accumulate in the Off-Island Purchases Deferral Account in 2018, 2019
 3 and 2020? Please show separately an estimate of savings from purchases
 4 over the Maritime Link based on a forecast of energy costs in the New
 5 England Power Pool and/or the New York Power Pool; i.e., marginal costs
 6 were determined based on a blend of New England ISO and New York –
 7 Zone A (CA-NLH-81).

8
 9 **Muskrat Falls**

10
 11 CA-NLH-194 (Reference response to NP-NLH-6) Based on this response, it appears that
 12 customers will be informed of rate impacts resulting from the Muskrat Falls
 13 project after the project is complete, rate impacts are understood and rate
 14 mitigation has been decided. Does Hydro consider it fair to customers to
 15 inform them after-the-fact rather than in advance to allow them time to
 16 mitigate rate increases through conservation, fuel switching, net metering,
 17 etc?

18
 19 CA-NLH-195 (Reference Application Volume 1, page 1.11) It is stated (lines 6 – 9):
 20 “Nalcor’s June 23, 2017 project update stated that average island
 21 residential electricity rates are expected to increase to 22.89 cents (¢) (plus
 22 HST) per kilowatt hour (kWh) in 2021 as a result of the Muskrat Falls
 23 Project. The present average rate for these customers is 11.7 ¢ per kWh
 24 (plus HST), a gap of 11.19 ¢ per kWh.” The expectation is that rates will
 25 almost double (96% increase) owing to the Muskrat Falls project. Please
 26 provide a comparison of an average rate of 22.89 cents/kWh to other
 27 Canadian jurisdictions. Are more recent estimates of the rate impacts of
 28 Muskrat Falls available since the June 23, 2017 estimate?

29
 30 CA-NLH-196 (Reference Application Volume 1, page 1.11) It is stated (lines 6 – 9):
 31 “Nalcor’s June 23, 2017 project update stated that average island
 32 residential electricity rates are expected to increase to 22.89 cents (¢) (plus
 33 HST) per kilowatt hour (kWh) in 2021 as a result of the Muskrat Falls
 34 Project. The present average rate for these customers is 11.7 ¢ per kWh
 35 (plus HST), a gap of 11.19 ¢ per kWh.” The expectation is that rates will
 36 almost double (96% increase) owing to the Muskrat Falls project. Is Hydro
 37 aware of any jurisdictions in Canada or the United States where rates have
 38 doubled owing to a single event? Please provide examples of cases in North

1 America where rates have increased by over 25% and explain what these
2 jurisdictions did to mitigate the rate increase.

3
4 CA-NLH-197 (Reference Application Volume 1, page 1.11) It is stated (lines 6 – 9):
5 “Nalcor’s June 23, 2017 project update stated that average island
6 residential electricity rates are expected to increase to 22.89 cents (¢) (plus
7 HST) per kilowatt hour (kWh) in 2021 as a result of the Muskrat Falls
8 Project. The present average rate for these customers is 11.7 ¢ per kWh
9 (plus HST), a gap of 11.19 ¢ per kWh.” Does the estimated rate increase
10 take into account elasticity effects? What reduction in demand does Hydro
11 expect from this increase in price, and what is the estimated impact on rates
12 of this load reduction? For example, has Hydro estimated the impact of the
13 rate increase on electric heating demand? Have any of the Island Industrial
14 Customers indicated that they will be forced to reduce or shutter operations
15 in response to the expected rate increase?
16

17 CA-NLH-198 (Reference Application Volume 1, page 1.11) It is stated (lines 6 – 9):
18 “Nalcor’s June 23, 2017 project update stated that average island
19 residential electricity rates are expected to increase to 22.89 cents (¢) (plus
20 HST) per kilowatt hour (kWh) in 2021 as a result of the Muskrat Falls
21 Project. The present average rate for these customers is 11.7 ¢ per kWh
22 (plus HST), a gap of 11.19 ¢ per kWh.” With such a large increase in rates,
23 is Hydro concerned about the possibility of a “rate death spiral”, or with
24 respect to itself and Newfoundland Power, a “utility death spiral”? Please
25 explain.
26

27 CA-NLH-199 (Reference Application Volume I, page 1.11) It is stated (lines 6 – 9):
28 “Nalcor’s June 23, 2017 project update stated that average island
29 residential electricity rates are expected to increase to 22.89 cents (¢) (plus
30 HST) per kilowatt hour (kWh) in 2021 as a result of the Muskrat Falls
31 Project. The present average rate for these customers is 11.7 ¢ per kWh
32 (plus HST), a gap of 11.19 ¢ per kWh.” In an effort to reduce rate impacts
33 on customers, has Hydro: 1) Approached the Board about relaxing some of
34 the requirements brought on by its Outage Inquiry? 2) Asked the
35 Government to consider opening the electricity market to wholesale
36 competition so that customers such as Newfoundland Power and the
37 Industrial Customers can shop for the lowest cost power available outside
38 the Province? 3) Approached the Board about implementation of
39 performance-based regulation for the transmission and distribution

- 1 components of the power sector? 4) Approached the Government about
 2 funding the rural deficit?
 3
- 4 CA-NLH-200 Please provide a table showing the date and amount of each cost estimate
 5 prepared for Muskrat Falls since the project was committed.
 6
- 7 *Miscellaneous*
 8
- 9 CA-NLH-201 (Reference response to CA-NLH-99) What public awareness programs has
 10 Hydro and Newfoundland Power implemented to assist customers with
 11 decisions relating to net metering opportunities? For example, has Hydro
 12 or NP published representative costs of rooftop solar and wind turbine
 13 installations and estimated pay-back periods at today's rates in different
 14 areas of the Province? Has Hydro or Newfoundland Power forecast
 15 payback periods for rooftop solar and wind turbine installations at rates post
 16 Muskrat Falls?
 17
- 18 CA-NLH-202 (Reference response to CA-NLH-126) Please further update the table to
 19 include 2017 Actuals for the month of October and include Hydro's best
 20 estimates for November and December 2017. Also include the implied
 21 Weighted Purchase Price for 2017.
 22
- 23 CA-NLH-203 (Reference response to CA-NLH-126) What are Hydro's latest forecasts of
 24 monthly No.6 fuel purchase prices for 2018 and 2019? Please provide the
 25 reference sources for those forecasts.
 26
- 27 CA-NLH-204 (Reference Volume I-Revised) Hydro indicates that the current retail price
 28 per KWh for island interconnected residential customers is 11.7 cents
 29 (p.1.11 line 22), that its GRA proposal would bring that rate to 13.3 cents
 30 in 2019 (p.1.11 lines 22 and 23) and that, primarily due to Muskrat Falls,
 31 Nalcor predicts that the rate would be 22.89 cents in 2021 (p.6.2, footnote
 32 4). Assuming an 85% AFUE for an oil-fired furnace, please express each
 33 of these per-KWh rates in terms of its energy-equivalent per-litre furnace
 34 oil price.
 35
- 36 CA-NLH-205 What is Hydro's estimate of the extent to which residential customers tend
 37 to switch from electric space heating to oil furnaces as the retail price of
 38 electricity rises relative to the price of furnace oil?

- 1 CA-NLH-206 What is Hydro's estimate of the annual penetration rate for heat pumps by
2 island interconnected customers? Has any trend in the reliance on heat
3 pumps been incorporated in Hydro's load forecast for the island
4 interconnected system?
5
- 6 CA-NLH-207 In the April 2017 Budget for Newfoundland and Labrador, Nalcor was
7 directed to find \$210 million as a "preliminary rate reserve". Can Hydro
8 comment on the impact of the \$210 million Nalcor rate reserve on Hydro's
9 2021 Rate Mitigation Plan.
10
- 11 CA-NLH-208 In relation to CA-NLH-139, please provide a similar overtime table for
12 2016 as has been provided for 2015.
13
- 14 CA-NLH-209 In relation to CA-NLH-139, please provide a similar overtime table for
15 2014, 2013, 2012, and 2011 as has been provided for 2015 in CA-NLH-
16 139.
17
- 18 CA-NLH-210 In CA-NLH-139 it is indicated that in 2015 overtime for Corporate Services
19 and Regulatory Affairs was \$800,000.00. Please indicate how much of this
20 amount was solely for regulatory affairs.
21
- 22 CA-NLH-211 In CA-NLH 139 it is indicated that \$400,000.00 was paid out in 2015 in
23 overtime for Corporate Services and Regulatory Affairs. Why does
24 Regulatory Affairs need to work overtime?
25
- 26 CA-NLH-212 In CA-NLH-139 it is indicated that the \$400,000.00 for Corporate Services
27 and Regulatory Affairs was capitalized. How much of this \$400,000.00
28 was capitalized for Regulatory Affairs?
29
- 30 CA-NLH-213 In CA-NLH-134 it is indicated that the Supervisor of Electrical and
31 Mechanical was paid a total of \$905,103.00 in salary and overtime between
32 2012 and 2016. Why does this position require this level of salary and
33 overtime?
34
- 35 CA-NLH-214 In relation to CA-NLH-134 please provide the total amount that the
36 Supervisor of Electrical and Mechanical was paid in salary and overtime
37 for the time period 2006 to 2011 inclusive.

- 1 CA-NLH-215 In relation to CA-NLH-134, has Hydro management now taken steps to
2 reduce all overtime?
3
- 4 CA-NLH-216 In CA-NLH-135 it is indicated that the total labour cost of Hydro's
5 Regulatory Affairs Department in 2016 was \$1.3 million. Please advise
6 how many employees were in Hydro's Regulatory Affairs Department in
7 2016 and 2017.
8
- 9 CA-NLH-217 In relation to CA-NLH-135, please advise if other employees of Hydro are
10 undertaking Regulatory Affairs' work.
11
- 12 CA-NLH-218 In relation to CA-NLH-135, why has a total cost of budgeted labour for the
13 Regulatory Affairs Department increased by \$400,000.00 in 2017?
14
- 15 CA-NLH-219 In relation to CA-NLH-157, please provide the preliminary projections of
16 power requirements by the new owners of the Wabush Mines' facilities.
17
- 18 CA-NLH-220 In relation to CA-NLH-157, have the new owners of the Wabush Mines'
19 facilities indicated how many MW will be required for the winter peak in
20 Labrador?
21
- 22 CA-NLH-221 In relation to CA-NLH-157, will the number of MW required by the new
23 owners of the Wabush Mines' facilities impact on the amount of recall
24 power available to be used for Muskrat Falls' rate mitigation?
25
- 26 CA-NLH-222 In response to CA-NLH-027, Hydro has indicated that it has not surveyed
27 its customers as to their preference between using either fuel cost savings
28 due to off-island purchases of electricity for rate mitigation in 2018 and
29 2019 or using those savings for post-Muskrat Falls mitigation. If Hydro did
30 survey its customers, and the survey indicated that Hydro's customers did
31 want the fuel cost savings to reduce the 2018-2019 rates, would Hydro use
32 those results to use the fuel savings to reduce the 2018-2019 rates?
33
- 34 CA-NLH-223 Can Hydro undertake a survey now to determine whether customers would
35 prefer using either fuel cost savings due to off-island purchases of
36 electricity for rate mitigation in 2018 and 2019 or using those savings for
37 the post-Muskrat Falls' mitigation.

1 CA-NLH-224 Referring to CA-NLH-033, what is Hydro's current projected rate increase
2 for July 1, 2018, using current oil prices to make the RSP adjustment?

DATED at St. John's, Newfoundland and Labrador, this 6th day of November, 2017.

Per:

A handwritten signature in blue ink, appearing to read "Dennis Browne", is written over a horizontal line.

Dennis Browne, Q.C.

Consumer Advocate

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