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August 14, 2019

Edward P. Poole, Q.C., Retired D. Paul Althouse, Q.C., Retired

## Via Electronic Mail & Courier

Newfoundland and Labrador Board of Commissioners of Public Utilities P.O. Box 21040 120 Torbay Road St. John's, NL A1A 5B2

Attention:

Ms. G. Cheryl Blundon

**Director of Corporate Services and Board Secretary** 

Dear Ms. Blundon:

Re:

2018 Hydro Cost of Service and Rate Design Review Application (the "Application")

Requests for Information – IC-CA-001 to IC-CA-005 & IC-NP-001 to IC-NP-005

Please find enclosed one original and thirteen (13) copies of the Requests for Information of the Island Industrial Customers Group in relation to the above noted Application.

We trust you find the foregoing satisfactory.

Yours very truly,

POOLE ALTHOUSE

Dean A. Porter

DAP/ag Enclosures J:\Clients\4648-21\NLBCPU, ltr 1.doc

Shirley Walsh - Newfoundland and Labrador Hydro cc:

Gerard Hayes - Newfoundland Power

Dennis M. Browne Q.C. - Consumer Advocate
Denis J. Fleming - Cox & Palmer
Senwung Luk - Olthuis Kleer Townshend LLP
Paul Coxworthy - Stewart McKelvey
Greg Moores - Stewart McKelvey

IN THE MATTER OF the Electrical Power Control Act, 1994, SNL 1994, Chapter E-5.1 and the Public Utilities Act, RSNL 1990, Chapter P-47 (the "Act");

AND IN THE MATTER OF an Application by Newfoundland and Labrador Hydro ("Hydro") for approval of revisions to its Cost of Service Methodology pursuant to Section 3 of the Electrical Power Control Act, 1994, SNL 1994, Chapter E-5.1 (the "Cost of Service Methodology Application") for use in the determination of test year class revenue requirements reflecting the inclusion of the Muskrat Falls Project costs upon full commissioning.

## ISLAND INDUSTRIAL CUSTOMERS GROUP REQUESTS FOR INFORMATION IC-NP-001 to IC-NP-005

Issued: August 14, 2019

IN THE MATTER OF the Electrical Power Control Act, 1994, SNL 1994, Chapter E-5.1 and the Public Utilities Act, RSNL 1990, Chapter P-47 (the "Act");

AND IN THE MATTER OF an Application by Newfoundland and Labrador Hydro ("Hydro") for approval of revisions to its Cost of Service Methodology pursuant to Section 3 of the *Electrical Power Control Act, 1994*, SNL 1994, Chapter E-5.1 (the "Cost of Service Methodology Application") for use in the determination of test year class revenue requirements reflecting the inclusion of the Muskrat Falls Project costs upon full commissioning.

1 2 3	THE	REQUESTS FOR INFORMATION OF ISLAND INDUSTRIAL CUSTOMERS GROUP IC-NP-001 to IC-NP-005
4	<u>Hyd</u>	ro's COS Methodology Review Application
5	Pre-filed Testi	mony filed by Larry Brockman (Newfoundland Power)
6 7 8	IC-NP-001	In Mr. Brockman's view, should COS methods consider how the utility's system is operated, in addition to how the system is planned?
9 10 11 12 13	IC-NP-002	With reference to Lines 1 through 6 on page 13 of Mr. Brockman's Pre-Filed Evidence (August 5, 2019), what approach, if any, does Mr. Brockman suggest for addressing the issues related to cost uncertainty for the costing of peaker units as discussed at lines 16 on page 34 through line 2 on page 35 of the Brattle Group report?
14 15 16 17 18 19 20	IC-NP-003	With reference to lines 14 through 17 on page 14 of Mr. Brockman's Pre-Filed Evidence (August 5, 2019), please discuss whether in Mr. Brockman's view plant vintage and valuation issues will need to be addressed in future COS studies beyond the current proceeding, and if so, how does Mr. Brockman recommend these issues be addressed if the equivalent peaker method is adopted.
21 22 23	IC-NP-004	Please discuss, in Mr. Brockman's view, whether functionalizing generation leads to transmission and then classifying them using the same ratios as the associated generation would be expected

1		to yield similar COS results as functionalizing them as generation. Why or why not?
3 4 5 6 7 8	IC-NP-005	With reference to lines 2 through 8 on page 35 of Mr. Brockman's Pre-Filed Evidence (August 5, 2019) please confirm whether Mr. Brockman considers it appropriate to continue the existing CBPP generation credit until a new agreement is developed or if he supports Hydro's proposal to terminate the existing agreement prior to the development of a new agreement.

**DATED** at St. John's, Newfoundland and Labrador, this \_\_\_\_\_\_ day of August, 2019.

POOLE ALTHOUSE		
Per: Dean A. Porter		
STEWART MCKELVEY		
Per:		
COX & PALMER		
Per: Denis J. Fleming		

TO: The Board of Commissioners of Public Utilities Suite E210, Prince Charles Building

120 Torbay Road

P.O. Box 21040 St. John's, NL A1A 5B2

Attention: Board Secretary

TO: Newfoundland & Labrador Hydro

P.O. Box 12400 500 Columbus Drive St. John's, NL A1B 4K7 Attention: Shirley Walsh

TO: Newfoundland Power

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

Attention: Gerard Hayes, Legal Counsel

TO: Browne Fitzgerald Morgan & Avis

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Attention: Dennis M. Browne Q.C., Consumer Advocate

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TO: Stewart McKelvey

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TO: Stewart McKelvey

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