

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

AND IN THE MATTER OF an Application by Newfoundland and Labrador Hydro (“Hydro”) for approval of certain capital projects necessary for the continued operation of the Holyrood Thermal Generation Station pursuant to Subsection 41(3) of the Act

**CONSUMER ADVOCATE
REQUESTS FOR INFORMATION
CA-NLH-001 to CA-NLH-009**

Issued: April 17, 2020

- 1 CA-NLH-001 If approved, how will this expenditure affect consumer rates and
2 what will be the effect of the expenditure on rate base?
3
- 4 CA-NLH-002 Some weeks ago, Nalcor announced that work had stopped at the
5 Muskrat Falls site as a result of the pandemic:
6
- 7 (a) When will work resume at the Muskrat Falls site and what is
8 the current forecasting for completion of the project and
9 commissioning?
10
- 11 (b) How will Muskrat Falls commissioning affect the use of the
12 Holyrood Thermal Generation Station?
13
- 14 (c) How will the commissioning affect the use of Hydro's gas
15 turbines?
16
- 17 (d) What is the long term plan for retaining these gas turbines
18 after the commissioning?
19
- 20 (e) What is the current cost of the fuel required for the gas
21 turbines and how does that cost compare with the cost of fuel
22 at the Holyrood Thermal Generation Station?
23
- 24 CA-NLH-003 Given Nalcor's policy of curtailing the work at Muskrat Falls due
25 to the pandemic, what pandemic policies and procedures has
26 Hydro put in place for contracting the work which is the subject of
27 this Application?
28
- 29 CA-NLH-004 Further to the above, does Hydro's pandemic preventative policies
30 and procedures conform with the pandemic preventative
31 requirements established by the health authorities?
32
- 33 CA-NLH-005 Will any contractors undertaking the work which is the subject of
34 this Application, be eligible for federal employer assistance grants
35 pertaining to the retention of employees, or indeed any other
36 federal grant, and have any such amounts been calculated in
37 estimating the cost of this project?
38
- 39 CA-NLH-006 What is the current anticipated demand going forward given the
40 current closures of education facilities, businesses, and industry
41 and the economic fallout resulting from the pandemic, including
42 the plight on new home construction? Please provide information
43 on anticipated demand and how this anticipated demand could

1 affect the operation of the Holyrood Thermal Generation Station,
2 gas turbines and fuel purchases?

3
4 CA-NLH-007 Please provide the estimated times the Holyrood Thermal General
5 Station and gas turbines were in operation during this past winter
6 and how much fuel was consumed and the cost of the same based
7 on best estimates? What is the anticipated cost of fuel going
8 forward in the next winter and resulting values?

9
10 CA-NLH-008 Will the Holyrood Thermal Generation Station be able to operate
11 in whole or in part, without the proposed refurbishment which is
12 the subject of this Application? Please provide a detailed response.

13
14 CA-NLH-009 Ratepayers were assured that the Maritime Link could be used to
15 import electricity onto the island.

16
17 (a) What electricity was imported onto the island during this past
18 winter and how did any such imports affect the operation of the
19 Holyrood Thermal Generation Station and gas turbines?

20
21 (b) Electricity is currently available on open markets at an
22 estimated price of \$0.02/kWh. What arrangements has Hydro
23 made for the purchase of the same through the efforts of Nalcor
24 Energy Marketing? Can Hydro utilize such purchases to curtail
25 the usage of the Holyrood Thermal Generation Station, gas
26 turbines and resulting fuel cost savings? Has this been
27 considered prior to making this Application?

DATED at St. John's, Newfoundland and Labrador, this 17th day of April, 2020.

Per: 

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