

# Office of the Consumer Advocate

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September 11, 2019

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's 2020 Capital Budget Application**

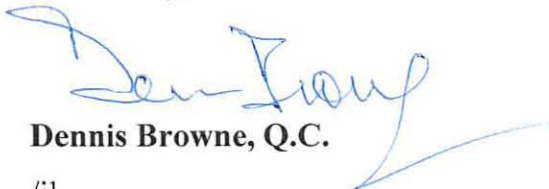
Further to the above-captioned, enclosed please find enclosed the original and twelve (12) copies of the Consumer Advocate's Requests for Information CA-NLH-001 to CA-NP-014.

A copy of this letter, together with enclosure, has been forwarded directly to the parties listed below.

Please be advise that our submission of September 4, 2019 requested a Technical Conference be convened in refence to this Application.

If you have any questions regarding the enclosed, please contact the undersigned at your convenience.

Yours truly,



**Dennis Browne, Q.C.**

/jl  
Enclosure

cc **Newfoundland & Labrador Hydro**  
Shirley Walsh ([ShirleyWalsh@nlh.nl.ca](mailto:ShirleyWalsh@nlh.nl.ca))  
Geoff Young ([gyoung@nlh.nl.ca](mailto:gyoung@nlh.nl.ca))  
NLH Regulatory ([NLHRegulatory@nlh.nl.ca](mailto:NLHRegulatory@nlh.nl.ca))

**Newfoundland Power Inc.**  
NP Regulatory ([regulatory@newfoundlandpower.com](mailto:regulatory@newfoundlandpower.com))  
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**Board of Commissioners of Public Utilities**  
Jacqui Glynn ([jglynn@pub.nl.ca](mailto:jglynn@pub.nl.ca))  
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PUB Official Email ([ito@pub.nl.ca](mailto:ito@pub.nl.ca))

**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** capital expenditures and rate base of Newfoundland and Labrador Hydro (“NLH”); and

**IN THE MATTER OF** an application by Newfoundland and Labrador Hydro for an order:

- (i) approving its 2020 Capital Budget in the amount of \$108,487,300;
- (ii) approving its capital purchases and construction projects in excess \$50,000 beginning in 2020;
- (iii) fixing and determining its average rate base for 2015 in the amount of \$1,747,308,000 and for 2016 in the amount of \$1,885,849,000

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**CONSUMER ADVOCATE  
REQUESTS FOR INFORMATION**

**CA-NLH-001 to CA-NLH-014**

**Issued: September 11, 2019**

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1	<b>Reference</b>	2020 Capital Budget Application Rewind Unit 3 Stator Holyrood –
2		Holyrood Thermal Generating Station Holyrood TGS Unit 3 Generator
3		
4	CA-NLH-001	The Project will take two years to complete with engineering and
5		procurement in the first year and execution in the second year with a
6		project estimate of \$6,945,600.00. Has Nalcor informed Hydro as to when
7		the Holyrood Thermal Generating Station is to be closed?
8		
9	CA-NLH-002	How is such an expenditure in reference to Holyrood justifiable if the plan
10		is to close Holyrood?
11		
12	<b>Reference</b>	<b>Holyrood Gas Turbine – Combustor Inspection</b>
13		
14	CA-NLH-003	Why is Hydro proposing to undertaking planning and procurement for this
15		project in 2020 to complete the work and overhaul work in 2021 if it is
16		Nalcor’s plan to close Holyrood?
17		
18	CA-NLH-004	What is the long-term plan for Holyrood re Holyrood Gas Turbine?
19		
20	CA-NLH-005	Has Nalcor requested Hydro to undertake this expenditure for overhaul
21		work for the Holyrood Gas Turbine in 2021 and is Nalcor aware of this
22		proposed expenditure?
23		
24	<b>Reference</b>	<b>Install Holyrood Gas Turbine Install Partial Discharge Monitoring</b>
25		
26	CA-NLH-006	Why is Hydro proposing to undertaking planning and procurement for this
27		project in 2020 to complete the work and overhaul work in 2021 when it
28		is the policy of Nalcor to close the Holyrood facilities?
29		
30	CA-NLH-007	What is the long-term plan for this Holyrood Gas Turbine Unit at
31		Holyrood?
32		
33	CA-NLH-008	Has Nalcor requested Hydro to undertake this expenditure for overhaul
34		work for the Install Holyrood Gas Turbine Install Partial Discharge
35		Monitoring in 2021?

1	<b>Reference</b>	<b>Holyrood Thermal Generating Facility</b>
2		
3	CA-NLH-009	Please provide a complete list of each and every capital/maintenance expenditure planned pertaining to the Holyrood Thermal Generating Facility for the period 2019 to 2023.
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7	CA-NLH-010	Please provide Hydro's plan pertaining to the retention of the Holyrood Generating Unit after the completion of the LIL and the transmission of Muskrat Falls power to the island of Newfoundland?
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10		
11	<b>Reference</b>	<b>2020 Capital Project's Overview/Introduction</b>
12		
13	CA-NLH-011	Hydro makes reference to "the continued load growth on the Avalon Peninsula" and considerations of the impact of forecast increases in electricity rates for Customers. On what basis has Hydro concluded there would be load growth on the Avalon Peninsula and has Hydro discussed such load growth with Newfoundland Power and please provide specifics as to the load growth estimates Hydro is predicting on the Avalon Peninsula and the basis for these conclusions?
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21	<b>Reference</b>	<b>2020 Capital Project's Overview Appendix A page A-2 Computer Technology System Support and Information Systems Generally</b>
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23		
24	CA-NLH-012	Has Hydro had discussions with Newfoundland Power regarding sharing of information systems and economies that can be realized, avoiding duplication in reference to technology support systems and information systems.
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26		
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29	CA-NLH-013	If there were only \$50,000,000 for 2020 capital projects allowed please provide a list of which projects would be prioritized in that circumstance?
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31		
32	CA-NLH-014	Is Hydro available and willing to attend a Technical Conference in reference to Hydro's 2020 Capital Budget?
33		

**DATED** at St. John's, Newfoundland and Labrador, this 11<sup>th</sup> day of September, 2019.

Per:



**Dennis Browne, Q.C.**

**Consumer Advocate**

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