

October 24, 2023

VIA E-MAIL cblundon@pub.nl.ca

Cheryl Blundon
Director of Corporate Services and Board Secretary
The Board of Commissioners of Public Utilities
Prince Charles Building
120 Torbay Road, P.O. Box 21040
St. John's, NL A1A 5B2

Dear Ms. Blundon:

**Re: Newfoundland and Labrador Hydro – 2021 Capital Budget Supplemental
Application Approval of the Construction of Phase 1 of Hydro's Long-term
Supply Plan for Southern Labrador – Requests for Information**

Enclosed are Requests for Information NCC-NLH-018 to NCC-NLH-020 regarding the above-noted application.

If you have any questions or require any clarification, please do not hesitate to contact me.

Yours very truly,

BURCHELL WICKWIRE BRYSON^{LLP}



Sarah L. MacLeod

SLM

cc:

Newfoundland and Labrador Hydro	Shirley Walsh shirleywalsh@nlh.nl.ca NLH Regulatory nlhregulatory@nlh.nl.ca
Newfoundland Power Inc.	Dominic Foley dfoley@newfoundlandpower.com NP Regulatory regulatory@newfoundlandpower.com
Consumer Advocate	Dennis Browne, K.C. dbrowne@bfma-law.com Stephen Fitzgerald sfitzgerald@bfma-law.com Sarah Fitzgerald sarahfitzgerald@bfma-law.com Bernice Bailey bbailey@bfma-law.com
Industrial Customer Group	Paul Coxworthy pcoxworthy@stewartmckelvey.com Dean Porter dporter@poolealthouse.ca Denis Fleming dfleming@coxandpalmer.com
Labrador Interconnected Group	Senwung Luk sluk@oktlaw.com Nick Kennedy nkennedy@oktlaw.com

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

IN THE MATTER OF an Application by Newfoundland and Labrador Hydro (“Hydro”) for an Order approving the Construction of ~~Phase 1 of Hydro’s~~ Long-Term Supply Plan for Southern Labrador, pursuant to Section 41(3) of the *Act*.

REQUESTS FOR INFORMATION

Submitted by NunatuKavut Community Council (“NCC”)

Long-Term Supply for Southern Labrador

NCC-NLH-018 to NCC-NLH-020

Submitted on: October 24, 2023

REQUESTS FOR INFORMATION

NCC-NLH-018

On page 11 (of 74) of Attachment 1 to Newfoundland and Labrador Hydro's ("NLH") reply document, Midgard Consulting states the following:

MSH [Mary's Harbour generating station] is currently in need of several outstanding upgrades to enable the facility to reach its scheduled retirement in 2030. The fourth station in the region, St. Lewis generating station ("SLE"), is relatively new and is scheduled for retirement in 2045. The existing generating stations range in age from 18 years (SLE) to 33 years (MSH) and several are scheduled for refits, **including the addition of modern fire suppression systems**. These refits have largely been deferred while a long-term plan for the region is developed to ensure that large capital expenditures are not made for assets that will be immediately retired. [Emphasis added]

Please identify the risk of any deferral to the addition of modern fire suppressions systems to the St. Lewis and Mary's Harbour generating stations. If there is potential risk, please provide all intended interim mitigation measures.

NCC-NLH-019

On page 13 (of 74) of Attachment 1 to Newfoundland and Labrador Hydro's reply document, Midgard Consulting states the following:

Provincially, the recent changes to Newfoundland and Electrical Power Control Act, 1994 add a requirement for NLH to consider environmental effects. However, as NLH has already been ensuring compliance with environmental regulations and has been actively working to reduce greenhouse gas ("GHG") emissions, this new provincial legislation is not anticipated to impact the generator selection in Southern Labrador.

It is concluded that the current known regulatory regime does not impact the selection of this generation source for a load not interconnected to a NERC [North American Electric Reliability Corporation] system as in Southern Labrador.

The above reply by Midgard Consulting appears to be in contrast to NLH's prior response to Requests for Information PUB-NLH-067 and NCC-NLH-003 regarding the requirement to produce power pursuant to the new legislative requirement of "... in an environmentally responsible manner."

Please confirm any justification and rationale for how the proposed regional diesel plant is environmentally responsible, as well as any analysis that was completed to reach this conclusion.

NCC-NLH-020

In its various submissions, NLH has stated that there is an additional engine bay which may be utilized for various purposes, such as to accommodate an additional genset (if required) or house renewable energy infrastructure and technologies.

Please provide further clarity regarding:

- i. The potential use of this engine bay to support additional gensets and renewable energy storage technologies;**
- ii. The likelihood that additional load infrastructure will be required; and**
- iii. The work required to provide the additional load capacity, if required.**