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August 23, 2022

Via Electronic Mail

Board of Commissioners of Public Utilities
Prince Charles Building
120 Torbay Road
P.O. Box 21040
St. John's, NL A1A 5B2

Attention: Ms. G. Cheryl Blundon
Director of Corporate Services & Board Secretary

Dear Ms. Blundon:

Re: Newfoundland and Labrador Hydro – 2023 Capital Budget Application

Please find attached 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
Encl.
J:\Clients\4648-60\NLBCPU, Ltr4.doc

cc Industrial Customers Group
Paul Coxworthy, Stewart McKelvey
Denis Fleming, Cox & Palmer

Newfoundland & Labrador Hydro
Shirley Walsh
NLH Regulatory
Kimberley Duggan

Newfoundland Power
Dominic J. Foley
Lindsay S.A. Hollett
Regulatory Email

Board of Commissioners of Public Utilities
Jacqui H. Glynn
PUB Official Email

Consumer Advocate
Dennis Browne, Q.C., Browne Fitzgerald Morgan & Avis
Stephen F. Fitzgerald, Browne Fitzgerald Morgan & Avis
Sarah G. Fitzgerald, Browne Fitzgerald Morgan & Avis
Bernice Bailey, Browne Fitzgerald Morgan & Avis
Bernard M. Coffey, Q.C.

Labrador Interconnected Group
Senwung F. Luk, Olthuis Kleer Townshend LLP
Josh Favel, Olthuis Kleer Townshend LLP

IN THE MATTER OF the *Public Utilities Act*,
RSNL 1990, c P-47 (the “Act”); and

IN THE MATTER OF an Application
by Newfoundland and Labrador
Hydro (“Hydro”) for approval of:

- (a) its capital budget for 2023,
pursuant to Section 41(1) of the
Act;
- (b) its proposed capital purchases
and construction projects for
2023 in excess of \$50,000,
pursuant to Section 41(3)(a) of
the Act; and
- (c) for an Order, pursuant to
Section 78 of the Act, fixing and
determining its average rate
base for 2021 (“Application”).

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**REQUESTS FOR INFORMATION OF THE
ISLAND INDUSTRIAL CUSTOMERS GROUP**

IC-NLH-1 – IC-NLH-5

ISSUED AUGUST 23rd, 2022

IC-NLH-1 **Volume 1, 2023 Capital Budget Overview, page 9, lines 7-13**

The End Consumer Performance Index was developed to measure the reliability of service to all end consumers of electricity in the province that are supplied by Hydro, other than Hydro’s Industrial customers...Therefore, the SAIDI (hours/customer) and SAIFI (interruptions/customer) data provided for End Consumer are measures of the duration and frequency of service interruptions experienced as a result of Hydro system events.

Has Hydro developed a similar Index to measure reliability of service to industrial customers, either individually or as a class? If not, why not?

IC-NLH-2 **Volume 1, 2023 Capital Budget Overview, page 31, Table 6:
Specifically Assigned Capital Work**

1 Please provide order-of-magnitude cost estimates or cost range estimates
2 for the 2026-2027 projects listed in Table 6 and proposed to be specifically
3 assigned to Braya Renewable Fuels.
4

5 Will the 2023-2024 and 2026-2027 projects listed in Table 6 and proposed
6 to be specifically assigned to Braya Renewable Fuels solely and
7 exclusively benefit Braya Renewable Fuels as a Hydro customer, or will
8 any of these capital works also be of benefit to other Hydro customers?
9

10 IC-NLH-3 **Volume 1, Five-Year Capital Plan (2023–2027), page 2, lines 8-9**

11
12 Hydro’s Application identifies “renewal of assets specifically assigned to
13 industrial customers (\$6 million)” as part of its Five-Year Capital Plan, and
14 by footnote 7 states that “Planned specifically-assigned expenditures are
15 included in the Terminal Station Renewal Program (2023) and the Circuit
16 Breaker Renewal Program (2023)”. Are all of the projects included in the
17 planned \$6 million of specifically assigned expenditures identified in the
18 Capital Budget Overview, page 31, Table 6: Specifically Assigned Capital
19 Work?
20

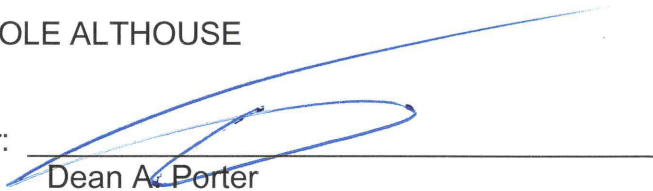
21 IC-NLH-4 If the Holyrood plant is expected to continue to have a base loading function from
22 2022 onwards, has Hydro, in its Capital Plan, taken fully into account the capital
23 projects necessary or prudent to maintain that function from 2022 onwards? If
24 not, what are the capital projects that can be foreseeably expected to be
25 necessary or prudent to maintain Holyrood’s base loading function from 2022
26 onwards?
27

28 IC-NLH-5 At this time, is Hydro aware of any other new projects within or outside its
29 Five-Year Capital Plan that will be proposed to be specifically assigned to
30 any member of the Island Industrial Customer Group (Braya Renewable
31 Fuels, Corner Brook Pulp & Paper Limited or Vale Newfoundland and
32 Labrador Limited)?

DATED at Corner Brook, in the Province of Newfoundland and Labrador, this 23rd day
of August, 2022.

POOLE ALTHOUSE

Per: _____



Dean A. Porter

STEWART MCKELVEY

Per: _____

 Paul L. Coxworthy

COX & PALMER

Per: _____

 Denis Fleming

- TO: The Board of Commissioners of Public Utilities
Attention: Ms. Cheryl Blundon, Board Secretary, Ms. Jacqui Glynn, PUB Official Email
- TO: Newfoundland & Labrador Hydro
Attention: Ms. Shirley Walsh, Ms. Kimberley Duggan, NLH Regulatory
- TO: Newfoundland Power Inc.
Attention: Mr. Dominic J. Foley, Ms. Lindsay Hollett, NP Regulatory
- TO: Labrador Interconnected Group
Attention: Senwung F. Luk, Josh Favel
- TO: Consumer Advocate
Attention: Mr. Dennis Browne, Q.C., Mr. Stephen F. Fitzgerald, Ms. Sarah G. Fitzgerald, Ms. Bernice Bailey, Mr. Bernard M. Coffey