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2024-09-19

Ms. Shirley Walsh
Senior Legal Counsel, Regulatory
Newfoundland and Labrador Hydro
P.O. Box 12400
Hydro Place, Columbus Drive
St. John's, NL A1B 4K7

Dear Ms. Walsh:

Re: Newfoundland and Labrador Hydro - 2024 Capital Budget Supplemental Application - Approval of Capital Expenditures for Replacement of Rigolet Unit 2065 and Fuel Storage Upgrades - Requests for Information

Enclosed are Requests for Information PUB-NLH-018 to PUB-NLH-021 regarding the above-noted application.

If you have any questions, please do not hesitate to contact the Board's Legal Counsel, Ms. Jacquelyn, by email, jglynn@pub.nl.ca or by telephone 709-726-6781.

Sincerely,

Jo-Anne Galarneau
Executive Director and Board Secretary

JG/cj

Enclosure

Newfoundland and Labrador Hydro

NLH Regulatory, E-mail: NLHRegulatory@nlh.nl.ca

Newfoundland Power Inc.

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NP Regulatory, E-mail: regulatory@newfoundlandpower.com

Industrial Customer Group

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Labrador Interconnected Group

Senwung Luk, E-mail: sluk@oktlaw.com

Nick Kennedy, E-mail: nkennedy@oktlaw.com

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

7
8 **IN THE MATTER OF** an application by
9 Newfoundland and Labrador Hydro for
10 approval of capital expenditures for
11 replacement of Rigolet Unit 2065 and
12 fuel storage upgrades, pursuant to
13 subsection 41(3) of the **Act**.

**PUBLIC UTILITIES BOARD
REQUESTS FOR INFORMATION**

PUB-NLH-018 to PUB-NLH-021

Issued: September 19, 2024

- 1 **PUB-NLH-018** In response to PUB-NLH-002, Hydro states that it “considers it prudent to apply
2 a buffer between the minimum capacity required to achieve its planning
3 criteria and the additional capacity gained by completing the upgrades,
4 particularly on systems displaying consistent load growth and when the
5 marginal cost of providing an incremental capacity buffer is low compared to
6 the cost of addressing unforeseen growth after the fact.”
7 a) Please advise when Hydro initiated the practice of applying a buffer in its
8 planning criteria.
9 b) Please provide details of other times Hydro has applied a buffer in its
10 planning criteria.
11 c) Please advise if Hydro has previously applied a buffer in its planning criteria
12 to support the choice of a higher cost alternative.
- 13
14 **PUB-NLH-019** a) Please summarize any policies in place for isolated systems in other
15 Canadian jurisdictions which address new customer requests that would
16 increase load as result of installing electric heating systems. In the
17 response, please identify the policy directives from a pricing and non-
18 pricing perspective including any requirement for contributions from
19 customers.
20 b) Has the Provincial Government issued any policy direction to limit the
21 installation of electric heating systems on isolated diesel systems? If so,
22 please provide a copy of the policy direction.
23 c) If policy direction has been issued on the installation of electric heating
24 systems on isolated diesel system, would this policy apply to the
25 Nunatsiavut Government? If not, why not?
26
- 27 **PUB-NLH-020** a) Further to the response to PUB-NLH-012, would the criteria for additional
28 generation be met if an alternative non-electric hearing system or a heat-
29 pump with a non-electric back-up system (e.g., high efficiency oil furnace)
30 was installed?
31 b) Please provide an estimate of the customer load requirements and the
32 isolated system forecast peak load if (i) an alternative non-electric heating
33 system or (ii) a dual heating system not requiring electric heating backup
34 was installed.
35 c) Please provide an estimate of the cost to install an alternative non-electric
36 heating system or a dual heating system, for example a high efficiency oil
37 furnace as a backup heating supply to the heat pump system
38 d) Are rebates or Conservation Demand Management initiatives available to
39 customers on isolated systems to incent the installation of heating systems
40 other than electric heating systems? If not, why not?

- 1 **PUB-NLH-021** Does Hydro meet with potential new customers in advance of construction of
2 new facilities to conduct a technical assessment of the system requirements?
3 If yes, please provide details of the information obtained through this process
4 and indicate at what stage of the new service request process Hydro collects
5 this information.

DATED at St. John's, Newfoundland and Labrador, this 19th day of September, 2024.

BOARD OF COMMISSIONERS OF PUBLIC UTILITIES

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A handwritten signature in blue ink, appearing to read 'Jo-Anne Galarneau', is written over a horizontal line.

Jo-Anne Galarneau

Executive Director and Board Secretary