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") and Regulations thereunder;

AND IN THE MATTER OF an Application by Newfoundland and Labrador Hydro, pursuant to Subsection 41(3) of the Act, for approval of the installation of an additional 230 kV transformer at the Oxen Pond Terminal Station.

1 REQUEST FOR INFORMATION OF THE ISLAND INDUSTRIAL CUSTOMERS

234567891012345678901123456789011234567890132232232232233333	IC-NLH-3	At page 7 of Hydro's Report in support of its Application, Hydro relates that the "impedance mismatch" outlined therein results in a "loss" of transformer capacity in the magnitude of 31.8 MVA.			
			(i)	Please explain how such capacity is "lost" and whether there are alternatives available to recapture such "lost" capacity in the loop short of installing a new transformer?; and	
			(ii)	If there are alternates available to recapture such "lost" capacity, please provide the manner in which this could be done and a detailed cost estimate to do so?	
	IC-NLH-4	At page 17 of Hydro's Report in support of its Application, Hydro relates that it relies on Newfoundland Power Energy and Demand Supply Forecasts to determine forecasted peak energy demand for Newfoundland Power delivery points.			
		(i)	To Hydro's knowledge, does Newfoundland Power carry out a five (5) year Energy and Demand Supply Forecast for Newfoundland delivery points each year?;		
		(ii)	lf not, Supp	how often are such five (5) year Energy and Demand ly Forecasts carried out?;	
		(iii)	At pa	ge 21 of Hydro's Report, it is stated that:	
			"An E From	nergy and Demand Supply Forecast was not received NP in 2009 for use in the development of Hydro's	

1 2 3 4 5 6			2010 Capital Budget and Five Year Plan. The base case load flow models for Hydro's 2010 Capital Budget Process were based upon the 2009 base case load flows with the 2013 year based upon the 2011 to 2012 growth rate for NP delivery points adjusted for the revised load power factor."			
7 8 9 10			Did Hydro enquire of Newfoundland Power as to whether a revised five (5) year Energy and Demand Supply Forecast was available for use in this development on its 2010 Capital Budget and Five Year Plan?:			
11 12		(iv)	At page 24 of Hydro's Report, it is stated:			
13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31 32	· · · · · · · · · · · · · · · · · · ·		"The 2010 analysis in support of Hydro's 2011 Capital Budget and Five Year Plan followed the same process at that used for the 2010 Capital Budget process. Without a revised Energy and Demand Forecast, the analysis relied upon the NP Energy and Demand Forecast 2008-2012 with application of the last year's growth rate to determine the delivery point peak loads for the year 2015."			
			Did Hydro enquire of Newfoundland Power as to whether a revised five (5) year Energy and Demand Supply Forecast was available for use in the development of its 2011 Capital Budget and Five Year Plan?			
		(v)	When did Hydro, to the best it its knowledge, receive the 2010-2014 five (5) year Energy and Demand Supply Forecast from Newfoundland Power?			
33 34 35 36 37 38 39 40 41 42 43 44 45 46	IC-NLH-5	Is the installation of a 230kV bus tie breaker, as proposed for the Oxen Pond Terminal Station, required at this time to meet the Increased station load requirements and transformer backup criteria?				
	IC-NLH-6	Of the anticipated \$19,134,000 budget estimate for this project (as outlined in Table 30, page 64 of Hydro's Report), how much is attributable to installation of a 230 kV bus tie breaker at the Oxen Pond Terminal Station? Please provide a detailed estimate of the costs on this portion of the Project.				
	IC-NLH-7	When was the 230 kV bus at the Oxen Pond Terminal Station installed? Has there ever been an instance when a planned outage				

1 2 3 4 5 6		of the 230 kV bus has resulted in a loss of load due to a "transmission system element failure" during the maintenance period? If so, please provide details of such instance, including the date, loss of load experienced and "transmission system element failure" leading to such loss of load.
7 8 9 10 11	IC-NLH-8	Would the cost of the installation of a 230 kV bus tie breaker increase, in Hydro's opinion, should the installation not occur at this time? If so, please provide a detailed cost estimate resulting for such delayed installation and the reasons for such increase?
12 13 14 15 16 17 18 19	IC-NLH-9	At page 35 of Hydro's Report, it is stated: "Eventually the load will increase to the level that it will be impossible to take a maintenance outage to the Oxen Pond 230 kV bus and connected equipment without a customer outage."

<u>DATED</u> at Corner Brook, in the Province of Newfoundland and Labrador, this 8th day of April, A.D., 2013

POOLE, ALTHOUSE Per: Dean A. Porter STEWART MCKELVE Per: Paul L. Coxworthy

TO: The Board of Commissioners of Public Utilities Suite E210, Prince Charles Building 120 Torbay road P.O. Box 21040 St. John's, NL A1A 5B2 Attention: Board Secretary

- TO: Newfoundland & Labrador Hydro P.O. Box 12400 500 Columbus Drive Attention: Geoffrey P. Young, Senior Legal Counsel
- TO: Thomas Johnson, Consumer Advocate O'Dea, Earle Law Offices 323 Duckworth Street St. John's, NL A1C 5X4
- TO: Newfoundland Power Inc. P.O. Box 8910 55 Kenmount Road St. John's, NL A1B 3P6 Attention: Gerard Hayes, Senior Legal Counsel