

September 4, 2015

Ms. G. Cheryl Blundon Board of Commissioners of Public Utilities 120 Torbay Road, P.O. Box 12040 St. John's, NL A1A 5B2

Ladies & Gentlemen:

Re: Newfoundland and Labrador Hydro 2016 Capital Budget Application Requests for Information – CA-NLH-01 to CA-NLH-61

In relation to the above noted application please find enclosed the Consumer Advocate's Requests for Information numbered CA-NLH-01 to CA-NLH-61.

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

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

Yours very truly,

O'DEA, EARLE

THOMAS JOHNSON, Q.C.

TJ/cel

cc: Newfoundland & Labrador Hydro P.O. Box 12400 500 Columbus Drive St. John's, NL A1B 4K7 Attention: Geoffrey P. Young, Senior Legal Counsel

Newfoundland Power

P.O. Box 891055 Kenmount RoadSt. John's, NL A1B 3P6Attention: Gerard Hayes, Senior Legal Counsel

Corner Brook Pulp & Paper Limited, c/o Stewart McKelvey Cabot Place, 100 New Gower Street P.O. Box 5038 St. John's, NL A1C 5V3 Attention: Paul Coxworthy



IN THE MATTER OF the *Public Utilities Act,* (the "Act"); and

IN THE MATTER OF an Application by Newfoundland and Labrador Hydro for an Order approving: (1) its 2016 capital budget pursuant to s.41(1) of the Act; (2) its 2016 capital purchases, and construction projects in excess of \$50,000 pursuant to s.41 (3) (a) of the Act; (3) its leases in excess of \$5,000 pursuant to s. 41 (3) (b) of the Act; and (4) its estimated contributions in aid of construction for 2016 pursuant to s.41 (5) of the Act.

Requests for Information by The Consumer Advocate

CA-NLH-01 to CA-NLH-61

September 4, 2015

1CA-NLH-01Tab: 2016 Capital Plan: p. B-10/B-11 Environmental Assessment of2the Bay d'Espoir to Western Avalon Report

Hydro outlines that this project was submitted for registration under Part 10 of the provincial
 Environmental Protection Act on July 16, 2015 and that its preferred route is within the Bay
 du Nord Wilderness Reserve (BDNWR) which requires the Lieutenant Governor in Council
 to reduce the size of the wilderness reserve. What alternate routes are being considered as
 part of the environmental assessment process?

9 CA-NLH-02 Tab: 2016 Capital Plan: p. B-10/B-11 Environmental Assessment of 10 the Bay d'Espoir to Western Avalon Report

11 For the alternative routes being considered in the environmental assessment, has Hydro 12 developed an estimate of the costs?

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14 CA-NLH-03 Tab: Holyrood Overview, p. 6

Under Phase 3 – Synchronous Condenser Operation Phase, Hydro lists the systems at
 Holyrood that will be requiring decommissioning. Has Hydro developed cost estimates for

1	the decommissioning of all the listed systems including for soil remediation associated with		
2	the site?		
3			
4	CA-NLH-04	Tab C – Projects \$500,000 and Over: p. C-43 – Replace Diesel Units,	
5		Cartwright and Charlottetown	
6	Is there any reco	Is there any recourse against the OEM of Unit 2079 installed in Charlottetown in light of its	
7	premature failure?		
8			
9	CA-NLH-05	Tab D – Projects Over \$200,000 and Less Than \$500,000: p. D-27 –	
10		Replace Powerhouse No. 1 Station Service Transformer, Bay	
11		d'Espoir	
12	Please outline the number of fault levels and arc flash levels occurring within the		
13	powerhouse's st	ation service system during the last five (5) years.	
14			
15	CA-NLH-06	Tab D – Projects Over \$200,000 and Less Than \$500,000: p. D-95 –	
16		Replace Vibration Monitoring System Unit 7, Bay d'Espoir	
17	Will this project, and Hydro's plans for the future, address all the recommendations set out at		
18	pages D-154 and	pages D-154 and D-155?	
19			
20	CA-NLH-07	Tab D – Projects Over \$200,000 and Less Than \$500,000: p. D-231 –	
21		Perform Condition Assessment of Control Structure, Hinds Lake	
22	A Gate 1 Cond	A Gate 1 Condition Assessment was completed during the week of February 16, 2015	
23	(Appendix A, p.	D-238). Does Hydro anticipate significantly different information will be	
24	obtained by an additional inspection to justify including Gate 1 in the current proposed		
25	project?		
26			
27	CA-NLH-08	Tab D – Projects Over \$200,000 and Less Than \$500,000: p. D-292 –	
28		Replace Human Machine Interface	
29	Please outline th	ne "minor loss of control and inaccurate alarming on new installations" for	
30	the existing HMI	the existing HMI referred to by Hydro at p. D-293, including when the issues occurred and	
31	how the issues w	how the issues were rectified.	
32			
33			

1CA-NLH-09Tab D – Projects Over \$200,000 and Less Than \$500,000: p. D-292 –2Replace Human Machine Interface

Appendix A outlines the product support lifecycle provided by Schneider Electric. For all versions except for Monitor Pro V2.0, rates are available at a cost until December 31, 2017. What are the rates being referred to? Has Hydro inquired as to the cost of maintaining the current systems until 2017?

CA-NLH-10 Tab D – Projects Over \$200,000 and Less Than \$500,000: p. D-353 – Replace Light Duty Mobile Equipment

Does Hydro have any information regarding the replacement criteria of other utilities in Atlantic Canada and throughout Canada for snowmobile and all-terrain vehicles used by "Transmission Line crews"? Does Hydro have any information regarding the replacement criteria of other utilities in Atlantic Canada and throughout Canada for snowmobile and allterrain vehicles for "others"?

CA-NLH-11 Tab D – Projects Over \$200,000 and Less Than \$500,000: p. D-353 – Replace Light Duty Mobile Equipment

18 Please provide specifics regarding the established mobile equipment replacement 19 guidelines Hydro uses with other Canadian utilities through participation on the Canadian 20 utility fleet counsel.

CA-NLH-12 Tab D – Projects Over \$200,000 and Less Than \$500,000: p. D-353 – Replace Light Duty Mobile Equipment

For all ATVs listed in Appendix A with age at retirement of 5.1 years, please outline which category these ATVs fall into as outlined at p. D-355 (i.e. do they fall into the snowmobile/all-terrain vehicles: transmission line crews or snowmobile/all-terrain vehicles: other).

28CA-NLH-13Tab D – Projects Over \$200,000 and Less Than \$500,000: p. D-395 –29Implement Industrial Billing Software, Hydro Place

30 What is the economic justification for this project in light of the few industrial customers who 31 operate in the province?

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1	CA-NLH-14	Tab D – Projects Over \$200,000 and Less Than \$500,000: p. D-395 –		
2		Implement Industrial Billing Software, Hydro Place		
3	Please provide	Please provide details on all requests received by Hydro in the last 2 years for faster billing		
4	cycles from indu	cycles from industrial customers.		
5				
6	CA-NLH-15	Tab D – Projects Over \$200,000 and Less Than \$500,000: p. D-397 –		
7		Replace Peripheral Infrastructure		
8	What is the incre	What is the increased cost of the extended maintenance with the manufacturer?		
9				
10	CA-NLH-16	Tab D – Projects Over \$200,000 and Less Than \$500,000: p. D-397 –		
11		Replace Peripheral Infrastructure		
12	What does the e	What does the extended maintenance cover?		
13				
14	CA-NLH-17	Tab E – Projects Over \$50,000 and Less Than \$200,000: p. E-56 –		
15		Replace Video Conferencing Bridge, Hydro Place		
16	Please outline a	all issues Hydro has had with the video conferencing system in the last 5		
17	years.			
18				
19	CA-NLH-18	Tab E – Projects Over \$50,000 and Less Than \$200,000: p. E-56 –		
20		Replace Video Conferencing Bridge, Hydro Place		
21	What was the a	What was the anticipated lifespan of the system when it was put in?		
22				
23	CA-NLH-19	Tab E – Projects Over \$50,000 and Less Than \$200,000: p. E-56 –		
24		Replace Video Conferencing Bridge, Hydro Place		
25	How long have	How long have some of the components of the existing Polycom system not been supported		
26	by the manufac	by the manufacturer?		
27				
28	CA-NLH-20	Tab E – Projects Over \$50,000 and Less Than \$200,000: p. E-66 –		
29		Upgrade Access Roads to Microwave Sites, Gull Pond Hill and		
30		Sandy Brook Hill		
31	Was the use of	Was the use of the helicopter for travel solely due to the road condition?		
32				

Tab E - Projects Over \$50,000 and Less Than \$200,000: p. E-66 -CA-NLH-21 1 Upgrade Access Roads to Microwave Sites, Gull Pond Hill and 2 Sandy Brook Hill 3 Please outline incidents in the last 5 years where private fuel suppliers have been unable to 4 access the sites for fuel delivery solely due to road conditions. 5 6 Volume II, Tab 7 – Rehabilitate Shoreline Protection, Cat Arm CA-NLH-22 7 Hydro outlines that the Alternative #2: Rock Armour Rehabilitation is the preferred method 8 and the least cost option. The proposed rock armour will be developed in a manner which 9 differs from what was utilized in 2005. How was the method of 2005 decided on? What 10 reviews and analysis did Hydro reply upon when choosing the rock armour pattern/method 11 in 2005? 12 13 Volume II, Tab 7 – Rehabilitate Shoreline Protection, Cat Arm CA-NLH-23 14 To what extent is this expenditure brought about by the failure of the 2005 work? 15 16 Volume II, Tab 8 – Upgrade Distribution Systems CA-NLH-24 17 How long has the majority of the line components identified for replacement been obsolete? 18 19 Volume II, Tab 8 – Upgrade Distribution Systems CA-NLH-25 20 What is Hydro's inventory of on-hand spares for the line components identified for 21 replacement? 22 23 Volume III, Tab 11 – Additions for Load Growth – Isolated Generating CA-NLH-26 24 Stations, L'Anse-au-Loup and Postville Diesel Plant 25 Please provide an update on the status of the 600 kw unit being replaced at L'Anse-au-Loup 26 with a 1,825 kw scheduled to occur during the summer of 2015. 27 28 Volume III, Tab 11 – Additions for Load Growth – Isolated Generating CA-NLH-27 29 Stations, L'Anse-au-Loup and Postville Diesel Plant 30 At p. 12, Hydro outlines that it has a secondary supply of power from Hydro Quebec for the 31 L'Anse-au-Loup area. Please provide details as to the power supply arrangement with 32 Hydro Quebec. 33

Volume III, Tab 11 – Additions for Load Growth – Isolated Generating CA-NLH-28 1 Stations, L'Anse-au-Loup and Postville Diesel Plant 2 Has Hydro considered approaching Hydro Quebec to address its forecasted shortfall? If so. 3 what are the costs of same? If not, why not? 4 5 Volume III, Tab 11 – Additions for Load Growth – Isolated Generating CA-NLH-29 6 Stations, L'Anse-au-Loup and Postville Diesel Plant 7 Please provide details on the conservation and demand management programs that Hydro 8 is pursuing to reduce the demand in the short, medium and long term for its isolated diesel 9 systems in Labrador. 10 11 Volume III, Tab 11 – Additions for Load Growth – Isolated Generating CA-NLH-30 12 Stations, L'Anse-au-Loup and Postville Diesel Plant 13 Please outline how the "direct load control pilot" Hydro is installing in Postville operates to 14 reduce maximum system demand. 15 16 Volume III, Tab 11 – Additions for Load Growth – Isolated Generating 17 CA-NLH-31 Stations, L'Anse-au-Loup and Postville Diesel Plant 18 Does the temporary nature of some of the L'Anse-au-Loup larger customers (i.e. the Valard 19 construction camp is expected to have a service life of 2 years) reduce the need for a new 20 unit in the long term? 21 22 Volume III, Tab 12 - Replace Diesel Units, Cartwright and CA-NLH-32 23 Charlottetown, Labrador 24 Please identify the new genset manufacturer for the Charlottetown replacement unit. Is this 25 the same manufacturer who made unit 2079 which failed prematurely? 26 27 Volume III, Tab 14 – Wood Pole Line Management Program CA-NLH-33 28 Hydro outlines in Section 3.2.3 (page 8) that: "Through this type of proper inspection and 29 maintenance the life of a transmission line could be extended by ten years or more." Does 30 Hydro have any evidence to support this claim? 31 32 33 34

1	CA-NLH-34	Volume III, Tab 17 – Insulator Replacement TL203	
2	Has Hydro contacted other utilities in Atlantic Canada or Canada in relation as to practices/		
3	techniques used for inspection of insulator pins?		
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5	CA-NLH-35	Volume III, Tab 17 – Insulator Replacement TL203	
6	Do any other utilities use high resolution cameras for the inspection of insulator pins? If so,		
7	which utilities?		
8			
9	CA-NLH-36	Volume III, Tab 18 – Replace Disconnect Switches	
10	What is the utility industry practice in terms of replacements based on age?		
11			
12	CA-NLH-37	Volume III, Tab 19 – Replace Protective Relays	
13	Please provide a	copy of the "draft transformer standard" prepared by Hydro in 2014.	
14			
15	CA-NLH-38	Volume III, Tab 27 – Replace Roof on Services Building, Bishop's	
16	Falls		
17	At page 7 Hydro states that the added safety benefits provided by cold-applied systems		
18	make it a clear cut choice for Hydro. Is the open flame heat source for the installation of the		
19	traditional hot applied system the only safety benefit being referred to by Hydro? If not,		
20	please list the safe	ety benefits of the cold applied roof Hydro is referring to.	
21			
22	CA-NLH-39	Volume III, Tab 27 – Replace Roof on Services Building, Bishop's	
23	Falls		
24	What is the cost of the hot applied roof versus the current proposal?		
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26	CA-NLH-40	Volume III, Tab 27 – Replace Roof on Services Building, Bishop's	
27	Falls		
28	Hydro outlines that cold applied roof systems were developed in the early 1980s (p. 5, Ta		
29	27). Was a cold applied roof system used in 1989? If not, why not?		
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1	CA-NLH-41 Vo	lume III, Tab 27 – Replace Roof on Services Building, Bishop's	
2	Falls		
3	In Appendix A, Tab 27 at p. A9, it is outlined that replacing the roof is a "Priority 2". Further,		
4	there is no recommendation on the roofing type. Has Hydro investigated whether a hot		
5	applied roof is more cost efficient?		
6			
7	CA-NLH-42 Vo	lume III, Tab 27 – Replace Roof on Services Building, Bishop's	
8	Falls		
9	In Appendix A, Tab 27 at p. A9, it is stated that replacing the roof is a "Priority 2". This		
10	project is given a rank of 47 by Hydro. Please explain why this projected cannot be		
11	deferred.		
12			
13	CA-NLH-43 Vo	lume III, Tab 29 – Upgrade Digital Fault Recorders	
14	Please outline any sp	ares for the fault recorders Hydro currently has on hand.	
15			
16	CA-NLH-44 Vo	lume III, Tab 29 – Upgrade Digital Fault Recorders	
17	Hydro states that the	system is not considered entirely obsolete (p. 6) and is given a rank of	
18	13 by Hydro. Given s	same, why can't this project be deferred?	
19			
20	CA-NLH-45 Vo	lume III, Tab 30 – Replace Vehicles and Aerial Devices	
21	Comparing Table 1 a	and Table 2 on page 2, does Hydro have an explanation as to why its	
22	kilometer criteria for l	ight duty vehicles are not in line with two out of the three other Atlantic	
23	electric utilities?		
24			
25	CA-NLH-46 Vo	lume III, Tab 30 – Replace Vehicles and Aerial Devices	
26	Comparing Table 1 a	and Table 2 on page 2, does Hydro have an explanation as to why its	
27	criteria assessment for kilometers in heavy duty vehicles are less than all three of the other		
28	Atlantic utilities surveyed?		
29			
30	CA-NLH-47 Vo	lume III, Tab 30 – Replace Vehicles and Aerial Devices	
31	At Appendix A Hydro	o outlines the vehicles to be replaced with the current proposal. Can	
32	Hydro explain why some vehicles did not reach both the age and kilometer criteria for		
33	replacement?		
34			

Volume III, Tab 30 – Replace Vehicles and Aerial Devices CA-NLH-48 1 Is Hydro aware of what the other surveyed Atlantic electric utilities do if a vehicle has 2 reached age or kilometers but not both in terms of assessment and replacement? 3 4 Volume III, Tab 30 – Replace Vehicles and Aerial Devices CA-NLH-49 5 Please provide details as to the specific criteria Hydro uses when reviewing a vehicle that 6 has reached either the years or kilometer threshold for assessment. 7 8 Volume III, Tab 30 – Replace Vehicles and Aerial Devices 9 CA-NLH-50 Hydro states at page 6: 10 Prior to the preparation of the capital budget proposal, a review of the latest 11 version of the database is performed to select the units which meet the 12 replacement criteria for age or kilometers, and to verify those which should be 13 included in the capital budget proposal based on their maintenance history or 14 ongoing maintenance issues. 15 16 For each of the vehicles listed in Appendix A, state whether the vehicle was included in the 17 current proposal based on the maintenance history or ongoing maintenance issues and 18 provide the details of same for each vehicle. 19 20 Volume III, Tab 32 – Replace MDR-4000 Microwave Radio (East) CA-NLH-51 21 Please outline any spares or components Hydro has on hand for the current system. 22 23 Volume III, Tab 35 – Replace Personal Computers CA-NLH-52 24 Why is there a one-year difference in the life cycle for laptops (4 years) versus desktops (5 25 26 years)? 27 Volume III, Tab 35 – Replace Personal Computers 28 CA-NLH-53 In Newfoundland Power's 2013 Capital Budget Application, Schedule B, page 83 of 93, 29 Newfoundland Power outlines that it is able to achieve a 5 year life cycle for its PC's, which 30 include desktop and laptop computers. Why is Hydro not able to achieve the same 5 year 31 32 cycle for its laptops? 33 34 35 36

1 CA-NLH-54 Volume III, Tab 35 – Replace Personal Computers

Hydro outlines that the cost of a laptop is approximately \$900.00 more than a desktop (page
2). Given this increase in cost, explain why some of the laptops (144) cannot be replaced
with desktops.

6 CA-NLH-55 Volume III, Tab 39 – Vehicles and Aerial Devices Fleet Additions

Please list the unique equipment used by Protection and Control technicians and Terminal
 station electricians. Can their equipment fit in vehicles currently held by Hydro? What sort
 of vehicles does Hydro intend to purchase for these positions?

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11 CA-NLH-56 Volume III, Tab 39 – Vehicles and Aerial Devices Fleet Additions

Please provide the current response time for the Protection and Control technicians and
 Terminal station electricians. What improvement does Hydro foresee with additional
 vehicles?

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CA-NLH-57 Volume III, Tab 39 – Vehicles and Aerial Devices Fleet Additions

How many apprentices does Hydro currently have? How does this number compare with
 each of the past 5 years? How are the apprentices currently attending worksites with line
 crews?

CA-NLH-58 Volume III, Tab 39 – Vehicles and Aerial Devices Fleet Additions

Has the office staff at Bishop's Falls ever used their own vehicles for a car pool? Has Hydro discussed this with staff?

25 CA-NLH-59 Volume III, Tab 39 – Vehicles and Aerial Devices Fleet Additions

Did any of the meter readers who were using their own vehicles voice concerns or complain to Hydro regarding same? If so, please provide the dates of complaints and the issues raised by the meter readers regarding use of their own vehicles.

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30 CA-NLH-60 Volume III, Tab 39 – Vehicles and Aerial Devices Fleet Additions

- What is the cost of a meter reader using his/her own vehicle in terms of mileage versus the purchasing of a new vehicle?
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- 34

1 CA-NLH-61 Volume III, Tab 39 – Vehicles and Aerial Devices Fleet Additions

Hydro states at p. 5 that while the meter readers in some locations are using their personal
 vehicles, Hydro can control the safety performance in meter reader vehicles when they are
 owned by Hydro. Please detail any issues with safety performance of personal meter
 reader vehicles over the last 5 years and what steps Hydro had to take to address same.

Dated at St. John's in the Province of Newfoundland and Labrador, this day of September, 2015.

Thomas Johnson, Q.C.

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