

1 Q. Does the NLSO have both the responsibility and the authority to operate the Island and
2 Labrador Interconnected power systems in a reliable and low-cost manner? Please reference
3 documentation and specific clauses within that documentation that grant the NLSO this
4 responsibility and authority. For example, does the NLSO have approval authority over load
5 forecasts and maintenance outage plans? Does the NLSO have the authority to “require” Hydro,
6 NP and the industrial customers to submit load forecasts and to review and approve equipment
7 maintenance and outage plans?

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10 A. The Newfoundland and Labrador System Operators (“NLSO”) has both the responsibility and the
11 authority to operate the integrated electric system in a reliable manner. The *Electrical Power*
12 *Control Act, 1994* (“EPCA”) grants the system operator this responsibility and authority. Section
13 14.3(1)(a) of the EPCA states that the system operator is established as the entity responsible
14 for the safe and reliable operation of the integrated electric system. Further, Section 14.3(4)
15 states that the system operator shall direct the operation of the integrated electric system and
16 Section 14.3(5) states that a transmission owner shall provide the system operator with the
17 authority to direct the operation of the part of the integrated electric system that it owns or
18 manages. The NLSO is designated as the system operator in Section 4 of the Open Access
19 Transmission Regulations.¹

20 The NLSO also has approval authority for maintenance and outage planning for the integrated
21 electric system. This approval authority is granted in Section 5 of the Open Access Transmission
22 Regulations, which lists the approval and scheduling of maintenance and outages for the
23 integrated electric system as one of the duties and functions of the system operator.

24 In addition, the NLSO has the authority to require Hydro to submit load forecasts.² Hydro, having
25 executed a Transmission Service Agreement (“TSA”) for Network Integration Transmission
26 Service with the NLSO, is a network customer of the NLSO. Section 2.1(c) of the TSA for Network

¹ The Open Access Transmission Regulations can be found at:
<<https://www.assembly.nl.ca/Legislation/sr/regulations/rc180042.htm>>.

² Hydro’s forecasts include forecasts of requirements for Newfoundland Power and industrial customers in the province.

1 Integration Transmission Service requires Network Customers to submit load forecasts to the
2 NLSO on a monthly and annual basis. Section 11.3 of the NLSO’s Transmission Policies and
3 Procedures also requires Network Customers to submit load forecasts to the NLSO.
4 Transmission Policies and Procedures and TSAs form part of the NLSO’s transmission tariff in
5 accordance with Section 8 of the Open Access Transmission Regulations, and, per Section
6 71.1(3) of the *Public Utilities Act*, this transmission tariff is binding on the system operator,
7 transmission customers, and transmission owners upon its approval by the Board of
8 Commissioners of Public Utilities (“Board”). The NLSO’s transmission tariff was approved by the
9 Board, on an interim basis, in Order No. P.U.3(2018). Both the Transmission Policies and
10 Procedures and the Pro Forma TSA for Network Integration Transmission Service can be found
11 on the NLSO Open Access Same-Time Information System.³

³ “Newfoundland and Labrador System Operator,” <<http://www.oasis.oati.com/NLSO/index.html>>.