Reliability and Resource Adequacy Study

Page 1 of 1

1 Q. Please provide 2017-2018 annual reports summarizing capacity assistance operations 2 including when capacity assistance was requested, from whom, and the costs associated 3 with these instances of capacity assistance. 4 5 Please refer to: 6 A. 7 8 PUB-NLH-044, Attachment 1: "Capacity Assistance Report: Vale and Praxair," April 16, 2018, for Winter 2017–2018; 9 10 • PUB-NLH-044, Attachment 2: "Capacity Assistance Report Corner Brook Pulp and 11 12 Paper," May 30, 2018, for Winter 2017–2018; and 13 • PUB-NLH-044, Attachment 3: "Capacity Assistance Agreements with Vale 14 Newfoundland and Labrador Limited," April 10, 2019, for Winter 2018–2019. 15



Hydro Place, 500 Columbus Drive. P.O. Box 12400. St. John's. NL Canada A1B 4K7 t. 709.737.1400 f. 709.737.1800 www.nlh.nl.ca

April 16, 2018

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

Attention:

Ms. Cheryl Blundon

Director of Corporate Services & Board Secretary

Dear Ms. Blundon:

Re: Newfoundland and Labrador Hydro - Capacity Assistance Report: Vale and Praxair

Please find enclosed the original and nine (9) copies of Newfoundland and Labrador Hydro's Capacity Assistance Report – Winter 2017-2018 outlining the dates, times, duration and system conditions, including generation available and calculation of system reserve, under which capacity assistance was requested, the capacity assistance requested and provided, and the capacity and variable payments made.

We trust the foregoing is satisfactory. If you have any questions or comments, please contact the undersigned.

Yours truly,

NEWFOUNDLAND AND LABRADOR HYDRO

Michael S. Ladha

Legal Counsel & Assistant Corporate Secretary

MSL/skc

c: Gerard Hayes – Newfoundland Power

Paul Coxworthy – Stewart McKelvey

Dennis Browne, Q.C. - Browne Fitzgerald Morgan & Avis

Danny Dumaresque

ecc: Denis Fleming- Cox & Palmer

Larry Bartlett - Teck Resources Ltd.

Roberta Frampton Benefiel – Grand Riverkeeper® Labrador

Capacity Assistance Report

Vale and Praxair

Winter 2017-2018

April 16, 2018

A Report to the Board of Commissioners of Public Utilities



Table of Contents

Execu	tive Summary1
1.0	Introduction2
2.0	Capacity Assistance Operating Experience - Summary2
3.0	Capacity Assistance Requests Winter 2017-2018 - Vale and Praxair3
3.1	December 27, 2017 –Vale and Praxair3
3.2	January 22, 2018 – Vale4
3.3	February 13, 2018 –Vale and Praxair5
3.4	February 14, 2018 – Vale and Praxair6
4.0	Capacity Assistance Costs7
5.0	Conclusion8
Tables	S
Table	1: Summary of Capacity Assistance Requests Vale and Praxair3
Table	2: Summary of Capacity Assistance Costs – Vale and Praxair7
Figure	es es
Figure	e 1: Supply and Demand Status Report for Wednesday, December 27, 20174
Figure	2: Supply and Demand Status Report for Monday, January 22, 20185
Figure	3: Supply and Demand Status Report for Tuesday, February 13, 20186
Figure	4: Supply and Demand Status Report for Wednesday, February 14, 20187
Apper	ndices
Apper	ndix A – Summary of Capacity Assistance Agreements
Apper	ndix B – Capacity Assistance Requests: Vale Capacity Assistance Agreement
Apper	ndix C – Capacity Assistance Requests: Praxair Capacity Assistance Agreement
Apper	ndix D – Supply and Demand Reports

Executive Summary

- 2 Newfoundland and Labrador Hydro (Hydro) presently has four capacity assistance agreements
- 3 in place with industrial customers; one with Corner Brook Pulp and Paper Limited (CBPP), two
- 4 with Vale Newfoundland and Labrador Limited (Vale), and one with Praxair Canada Inc.
- 5 (Praxair).

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- 7 This report provides the following for winter 2017-2018 for Vale and Praxair:
- 8 i) the capacity assistance requested and provided, including dates, times and duration;
 - ii) the system conditions at the time of the capacity assistance request, including generation available and calculation of system reserve; and
- 11 iii) payments made.

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- 13 A summary of the key terms and conditions of Hydro's capacity assistance agreements with
- 14 Vale and Praxair is attached in Appendix A.

- As per the Board of Commissioners of Public Utilities (the Board) order P.U. 34(2017), a report
- detailing the use of the revised capacity assistance agreement with CBPP will be submitted to
- 18 the Board on May 30, 2018.

1.0 Introduction

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2 Capacity assistance arrangements are used as a means to minimize disruptions to customers in 3 the event of a contingency or to maintain sufficient level of operating reserves for reliable 4 operation of the electrical system. This support is normally requested during times of high or peak customer demand or in instances where there are issues with generation or regional 5 6 transmission during the winter operating season. 7 8 Hydro has two capacity assistance agreements with Vale. The first agreement, the Vale Capacity 9 Assistance Agreement, is for the supply of up to 15.8 MW of capacity assistance from Vale's 10 standby diesel generating facilities, subject to an annual test. The amount of capacity assistance 11 that was available for winter 2017-2018, confirmed during annual testing, was 7.6 MW. Order 12 No. P.U. 3(2017), issued in January 2017, approved Hydro's second capacity assistance 13 agreement with Vale, the Vale Curtailment Agreement, which provides 6 MW of load 14 curtailment by Vale. 15 16 In Order No. P.U. 55(2016), the Board approved the Capacity Assistance Agreement with Praxair 17 Canada Inc. which provides up to 5 MW of load curtailment by Praxair during winter peak 18 demand periods. 19 20 In accordance with Board direction, this report summarizes the details and costs associated 21 with Hydro's use of the capacity assistance agreements for the winter period December 1, 2017

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to March 31, 2018.

2.0 Capacity Assistance Operating Experience - Summary

During winter of 2017-2018, Hydro made five requests for capacity assistance from Vale and three requests from Praxair. A summary of the requests is provided in Table 1. Hydro did not utilize the Vale Load Curtailment Agreement. On one occasion, Praxair was unable to provide capacity assistance when requested by Hydro.

Agreement	Number of Requests for Assistance	Total Number of Hours of Assistance Provided	Total Capacity Assistance Provided (equivalent kWh)
Vale Capacity Assistance	5	29.5 hours	198,884 kWh
Vale Load Curtailment	0	0 hours	0 kWh
Praxair Capacity Assistance	3	7.5 hours	37,827 kWh
2017-2018 Total	8	37 hours	236,711 kWh

1 3.0 Capacity Assistance Requests Winter 2017-2018 - Vale and Praxair

- 2 The following summaries provide an overview of the system conditions and capacity assistance
- 3 provided during the capacity assistance requested events. Additional details, including start and
- 4 end times, are attached in Appendices B and C. For details on system conditions, including
- 5 actual peak demand values, see Appendix D for the Supply and Demand Status Reports
- 6 applicable to each day, as submitted to the Board.

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3.1 December 27, 2017 – Vale and Praxair

On December 27, 2017, with a weather warning in effect for areas of the province, Island generating capacity was reduced by the derations of all Holyrood units due to air supply issues; the Stephenville gas turbine was derated due to limitations posed by the capacity of the leased engine; and forecast spinning reserve was low for both the morning and the evening peaks. To assist in maintaining adequate spinning reserves during the morning peak, standby generation was operated. The Upper Salmon unit became unavailable due to frazil ice and Holyrood Unit 3 was further derated by 10 MW in afternoon, prior to the evening peak. A Level 1 alert was forecast for the evening, based on available Island reserve. In addition to starting standby generation and requesting CBPP capacity assistance, Hydro requested capacity assistance from Vale and Praxair to support Island spinning reserves throughout the day and evening periods, as follows:

 Vale Capacity Assistance: Vale provided 7.6 MW through its diesel generation from 1000 to 2200 hours; and Praxair Capacity Assistance: Praxair provided 5.0 MW of curtailment from 1730 to 2200
 hours.

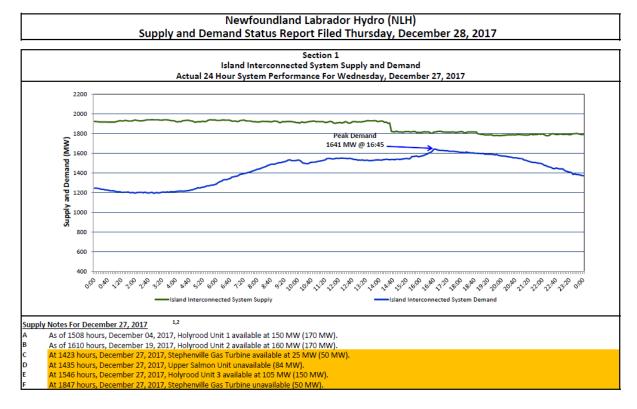


Figure 1: Supply and Demand Status Report for Wednesday, December 27, 2017

3 3.2 January 22, 2018 – Vale

- 4 On January 22, 2018, Holyrood Unit 1 was unavailable due to a boiler stop valve leak and Units
- 5 2 and 3 were derated due to air supply issues; the Stephenville Gas Turbine capacity was
- 6 reduced to 25 MW due to a vibration issue with the leased engine; and forecast Island reserve
- 7 for the evening peak was close to that of a Level 2 alert. In addition to operating standby
- 8 generation and requesting Capacity Assistance from CBPP, Hydro requested capacity assistance
- 9 from Vale to support Island spinning reserves, as follows:
 - Vale Capacity Assistance: Vale provided 7.6 MW through its diesel generation from 1500
- 11 to 1900 hours.

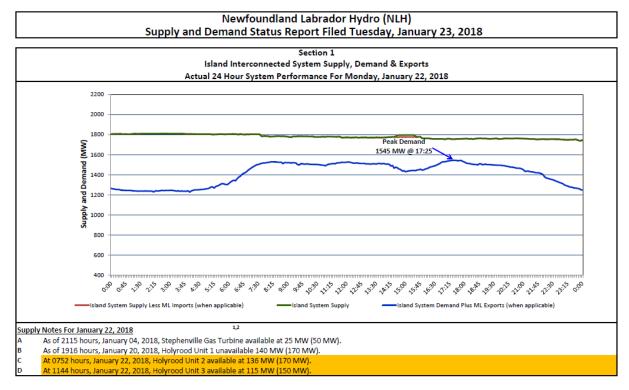


Figure 2: Supply and Demand Status Report for Monday, January 22, 2018

3.3 February 13, 2018 – Vale and Praxair

- 2 On February 13, 2018, Holyrood Unit 1 remained unavailable due to the boiler stop valve leak
- 3 and Units 2 and 3 were derated due to air supply issues; Holyrood Unit 2 was derated to 127
- 4 MW; Holyrood Unit 3 was derated to 103 MW; the Stephenville Gas Turbine remained derated
- 5 to 25 MW and a Level 1 alert was forecast for the evening, based on available Island reserve. In
 - addition to operating standby generation and requesting CBPP Capacity Assistance, Hydro
- 7 requested capacity assistance from Vale and Praxair to support Island spinning reserves, as
- 8 follows:

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- Vale Capacity Assistance: Vale provided 7.6 MW through its diesel generation from 1600 to 2330 hours; and
- Praxair Capacity Assistance: Hydro requested Praxair provide 5.0 MW of curtailment from 1600 to 1900 hours.

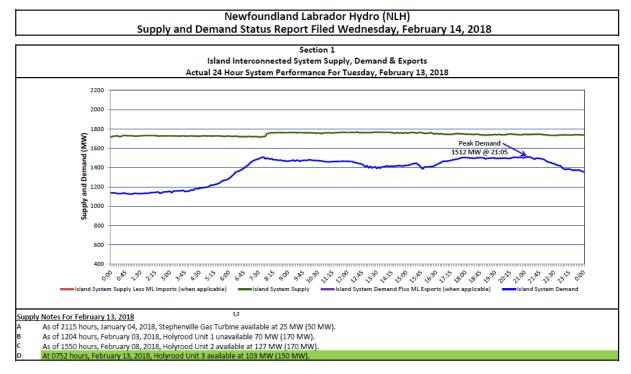


Figure 3: Supply and Demand Status Report for Tuesday, February 13, 2018

3.4 February 14, 2018 – Vale and Praxair

- 2 On February 14, 2018, Holyrood Unit 1 remained unavailable due to a boiler stop valve leak and
- 3 Units 2 and 3 were derated due to air supply issues; Holyrood Unit 2 was derated to 124 MW
- 4 and Unit 3 was derated to 110 MW; the Stephenville Gas Turbine remained derated to 25 MW;
- 5 and forecast Island reserve for the morning peak was just inside Level 2 alert. In addition to
- 6 starting both Hydro's and Newfoundland Power's standby generation and requesting CBPP
- 7 Capacity Assistance, Hydro requested capacity assistance from Vale and Praxair to support
- 8 Island spinning reserves, as follows:

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- Vale Capacity Assistance: Vale provided 7.6 MW through its diesel generation from 0600 to 0930 and 1615 to 1845 hours; and
- Praxair Capacity Assistance: Hydro requested Praxair provide 5.0 MW of curtailment at 0600 hours; however, Praxair was not able provide capacity assistance for this request.

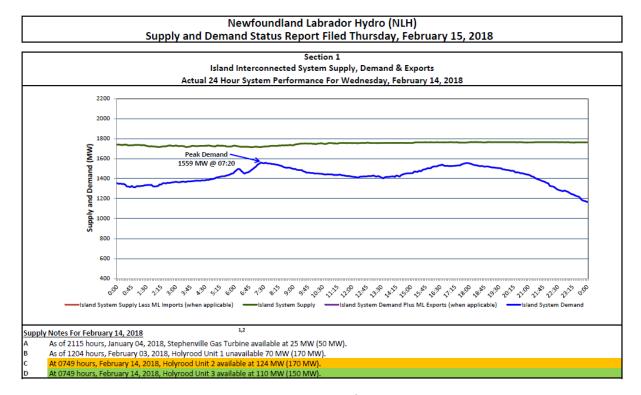


Figure 4: Supply and Demand Status Report for Wednesday, February 14, 2018

1 4.0 Capacity Assistance Costs

- 2 The overall cost of capacity assistance for the 2017-2018 winter season is provided in Table 2.
- 3 Additional details on the contract conditions, including rate structures, are included in Appendix
- 4 A.

Table 2: Summary of Capacity Assistance Costs - Vale and Praxair

Agreement	Fixed Charge (\$)	Variable Charge (\$)	Total (\$)
Vale Capacity Assistance	212,800	67,724	280,524
Vale Load Curtailment	168,000	-	168,000
Praxair Capacity Assistance ¹	70,000	7,565	77,565
2017-2018 Total			526,089

¹ On February 14, 2018, Praxair was unable to provide capacity assistance. As per contract conditions their fixed monthly payment for their total Winter Season Fixed Payment was reduced by 50% as per the contract, see Appendix A.

1 5.0 Conclusion

- 2 Hydro made eight capacity assistance requests from Vale and Praxair in Winter 2017-2018 that
- 3 helped Hydro ensure reliable service for its customers. While Hydro's existing capacity
- 4 assistance agreements with Vale and Praxair expired at the end of March 2018, Hydro
- 5 continues to evaluate whether these agreements should be continued through interconnection
- 6 as part of its focus on customer reliability.

PUB-NLH-044, Attachment 1
Reliability and Resource Adequacy Study
Page 12 of 22

Capacity Assistance Report Vale Praxair Winter 2017-2018 Appendix A

Appendix A

Summary of Capacity Assistance Agreements

Capacity Assistance Report Vale Praxair Winter 2017-2018
Appendix A

Summary of Capacity Assistance Agreements – Vale and Praxair

Provider	Contracted	Rate Structure	Conditions
Vale Diesels	Up to 15.8 MW	Fixed \$7/kW per month for each of the four winter months December through March for a total maximum of \$442k Variable Cost of fuel	 Notification Period - 20 minutes Interruption Period - 3 hours (minimum) to 6 hours (maximum) Maximum number of curtailments - 2 per day, 20 per winter Total Assistance Period - 100 hours per winter Penalties - Downward adjustment based on average capacity² Expiry - March 31, 2018 Test - Tested annually, for Winter 2017-2018; 7.6 MW confirmed
Vale Load Curtailment	6 MW	Fixed \$7/kW per month for each of the four winter months December through March for a total of \$168k Variable \$0.20 per kW per hour for the maximum assistance provided	 Notification Period – 60 minutes Interruption Period – 3 hours (minimum) to 6 hours (maximum) Maximum number of curtailments - 2 per day, 10 per winter Total Assistance Period - 50 hours per winter Penalties - Three Strike Clause Expiry - March 31, 2018 Test - Tested annually, for Winter 2017-2018; 6 MW confirmed
Praxair	5 MW	Fixed \$7/kW per month for each of the four winter months December through March for a total of \$140k Variable \$0.20 per kW per hour for the maximum assistance provided	 Notification Period – 603 minutes Interruption Period – 3 hours (minimum) to 6 hours (maximum) Maximum number of curtailments - 2 per day, 10 per winter Total Assistance Period - 50 hours per winter Penalties - Three Strike Clause Expiry - March 31, 2018 Test - Tested annually, for Winter 2017-2018; 5 MW confirmed

² The agreement was amended to provide economic incentive to Vale after multiple failures to provide the full amount of capacity assistance to Hydro early in winter 2015-2016. The amended agreement compensates Vale for making capacity available upon Hydro's request but if the full amount of capacity is not delivered upon any request by Hydro, the agreement provides for a downward adjustment to those payments by basing the capacity payment upon the average amount of capacity delivered in the winter season.

³ For the first request in a twenty-four hour period, sixty minutes notice is required. For a second request in the same twenty-four hour period notice must be given no less than sixty minutes prior to the scheduled ending of the first request.

PUB-NLH-044, Attachment 1
Reliability and Resource Adequacy Study
Page 14 of 22

Capacity Assistance Report Vale Praxair Winter 2017-2018 Appendix B

Appendix B

Capacity Assistance Requests: Vale Capacity Assistance Agreement

Newfoundland and Labrador Hydro

Capacity Assistance Requests: Vale Capacity Assistance - Diesel Generation

Date	Start Time	End Time	Duration (hh:mm)	System Generation	System Available	System Spinning	Maximum Capacity	Maximum Capacity
				Available (MW)	Reserve (MW)	Reserve (MW)	Assistance Requested (MW)	Assistance Provided (MW)
December 27, 2017	10:00	22:00	12:00	1894	474	140	7.6	9.7
January 22, 2018	15:00	19:00	4:00	1768	371	191	7.6	7.6
February 13, 2018	16:00	23:30	7:30	1753	417	213	7.6	7.6
February 14, 2018	00:9	9:30	3:30	1727	366	193	9.7	7.6
February 14, 2018	16:15	18:45	2:30	1757	365	174	7.6	7.6
				_				

PUB-NLH-044, Attachment 1
Reliability and Resource Adequacy Study
Page 16 of 22

Capacity Assistance Report Vale Praxair Winter 2017-2018 Appendix C **Appendix C** Capacity Assistance Requests: Praxair Capacity Assistance Agreement

Newfoundland and Labrador Hydro

Capacity Assistance Requests: Praxair Capacity Assistance Agreement

Date	Start Time	End	Duration (hh:mm)	Duration System (hh:mm) Generation Available (MW)	System System Available Spinning Reserve Reserve (MW) (MW)	System Spinning Reserve (MW)	Maximum Capacity Assistance Requested (MW)	Maximum Capacity Assistance Provided (MW)
December 27, 2017	17:30	22:00	4:30	1786	328	133	5.0	5.0
February 13, 2018	16:00	19:00	3:00	1753	417	213	5.0	5.0
February 14, 2018	00:9	00:9	0:00	1727	366	193	5.0	0.0

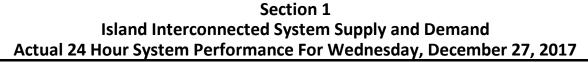
PUB-NLH-044, Attachment 1
Reliability and Resource Adequacy Study
Page 18 of 22

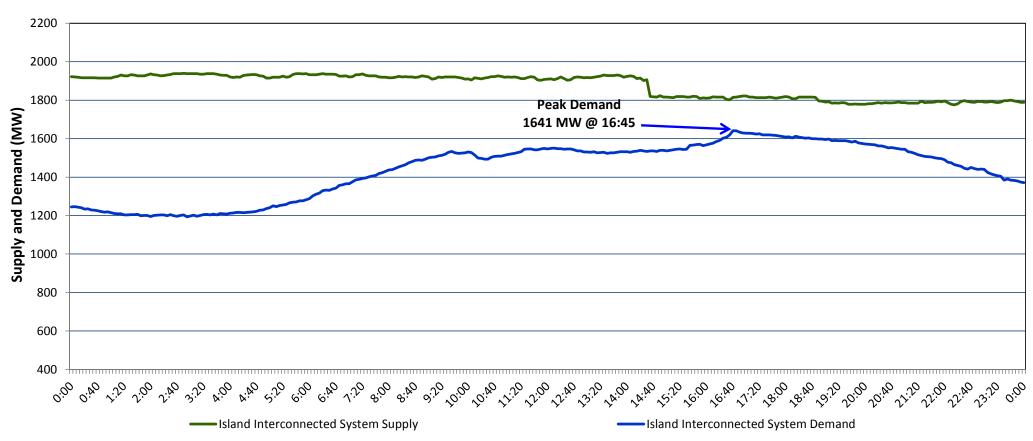
Capacity Assistance Report Vale Praxair Winter 2017-2018
Appendix D

Appendix D

Supply and Demand Reports

Newfoundland Labrador Hydro (NLH) Supply and Demand Status Report Filed Thursday, December 28, 2017





Supply Notes For December 27, 2017

As of 1508 hours, December 04, 2017, Holyrood Unit 1 available at 150 MW (170 MW).

As of 1610 hours, December 19, 2017, Holyrood Unit 2 available at 160 MW (170 MW).

At 1423 hours, December 27, 2017, Stephenville Gas Turbine available at 25 MW (50 MW).

At 1435 hours, December 27, 2017, Upper Salmon Unit unavailable (84 MW).

At 1546 hours, December 27, 2017, Holyrood Unit 3 available at 105 MW (150 MW).

At 1847 hours, December 27, 2017, Stephenville Gas Turbine unavailable (50 MW).

		Isla	Section 2 nd Interconnected Supply and De	mand			
Thu, Dec 28, 2017 Isl	and System Outlo	ook ³	Seven-Day Forecast		erature C)	Island System Daily (MW	-
				Morning	Evening	Forecast	Adjusted ⁷
Available Island System Supply: ⁵	1,785	MW	Thursday, December 28, 2017	-5	-3	1,535	1,426
NLH Generation: ⁴	1,485	MW	Friday, December 29, 2017	-3	-4	1,545	1,436
NLH Power Purchases: ⁶	110	MW	Saturday, December 30, 2017	-7	-2	1,470	1,362
Other Island Generation:	190	MW	Sunday, December 31, 2017	-4	-1	1,495	1,387
Current St. John's Temperature:	-6	°C	Monday, January 01, 2018	-3	-4	1,530	1,421
Current St. John's Windchill:	-18	°C	Tuesday, January 02, 2018	-5	-4	1,545	1,436
7-Day Island Peak Demand Forecas	st: 1,545	MW	Wednesday, January 03, 2018	-5	-4	1,510	1,401

Supply Notes For December 28, 2017

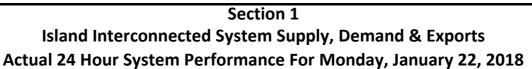
Notes:

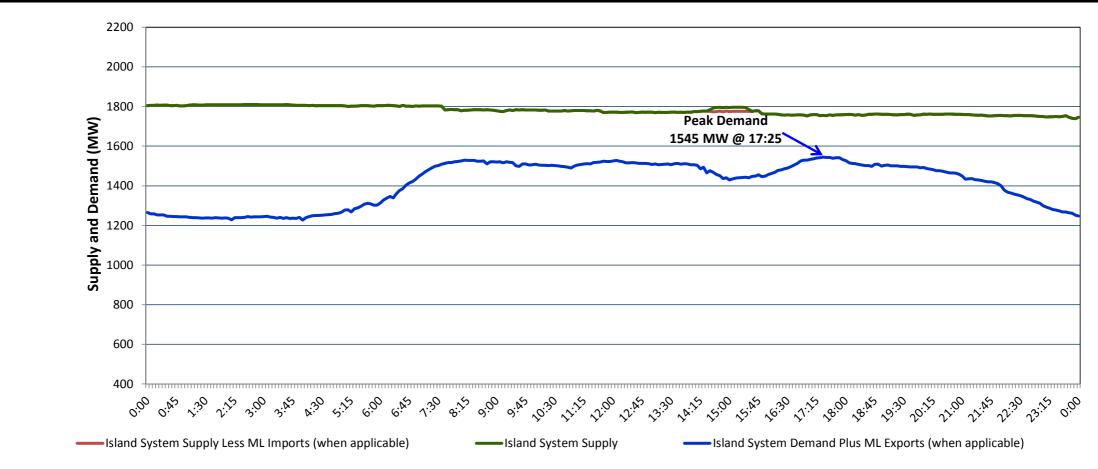
- 1. Generation outages for running and corrective maintenance are included. These are not unusual for power system operations. They generally do not impact customer supply. The power system operators schedule outages to system equipment whenever possible to coincide with periods when customer demands are low and sufficient supply reserves are available. However, from time to time equipment outages are necessary and reserves may be impacted.
- 2. Due to the Island Interconnected System being isolated from the larger North American grid, when there is a sudden loss of large generating units some customer's load must be interrupted for short periods to bring generation output equal to customer demand. This automatic action of power system protection, referred to as under frequency load shedding, is necessary to ensure the integrity and reliability of system equipment. Under frequency events typically occur 5 to 8 times per year on the Island Interconnected System and the resultant customer load interruptions are generally less than 30 minutes.
- 3. As of 0800 Hours.
- 4. Gross output including station service at Holyrood (24.5 MW) and improved NLH hydraulic output due to water levels (35 MW).
- 5. Gross output from all Island sources (including Note 4).
- 6. NLH Power Purchases include: CBPP Co-Gen, Nalcor Exploits, Rattle Brook, Star Lake, Wind Generation, Vale capacity assistance and Maritime Link Import (when applicable).
- 7. Adjusted for CBP&P and Vale and Praxair interruptible load, the impact of voltage reduction and Maritime Link Exports (when applicable).

	Section Section Island Peak Dema Island Peak Dema Previous Day Actual Peak and	and Information	
Wed, Dec 27, 2017	Actual Island Peak Demand ⁸	16:45	1,641 MW
Thu, Dec 28, 2017	Forecast Island Peak Demand		1,535 MW
, , , , , , , , , , , , , , , , , , ,			·

Notes: 8. Island Demand is supplied by NLH generation and purchases, plus generation owned and operated by Newfoundland Power and Corner Brook Pulp & Paper (Deer Lake Power, DLP).

Newfoundland Labrador Hydro (NLH) Supply and Demand Status Report Filed Tuesday, January 23, 2018





Supply Notes For January 22, 2018

1,2

- As of 2115 hours, January 04, 2018, Stephenville Gas Turbine available at 25 MW (50 MW).
- As of 1916 hours, January 20, 2018, Holyrood Unit 1 unavailable 140 MW (170 MW).
- At 0752 hours, January 22, 2018, Holyrood Unit 2 available at 136 MW (170 MW).
- D At 1144 hours, January 22, 2018, Holyrood Unit 3 available at 115 MW (150 MW).

Section 2 Island Interconnected Supply and Demand **Temperature Island System Daily** Island System Outlook³ Tue, Jan 23, 2018 (°C) Peak Demand (MW) Seven-Day Forecast Adjusted⁷ Forecast Morning Evening Available Island System Supply:5 1,745 MW Tuesday, January 23, 2018 -8 -5 1,605 1,391 NLH Generation: 1,430 Wednesday, January 24, 2018 0 1,440 1,268 MW 5 NLH Power Purchases:⁶ Thursday, January 25, 2018 110 MW 0 -4 1,510 1,401 Friday, January 26, 2018 -6 -5 1,540 1,372 Maritime Link Imports: MW Saturday, January 27, 2018 -7 Other Island Generation: -9 1,595 1,485 205 MW -8 °C °C Sunday, January 28, 2018 Current St. John's Temperature & Windchill: -16 -4 1 1,327 1,510 7-Day Island Peak Demand Forecast: Monday, January 29, 2018

Supply Notes For January 23, 2018

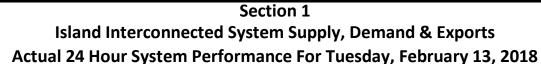
Notes:

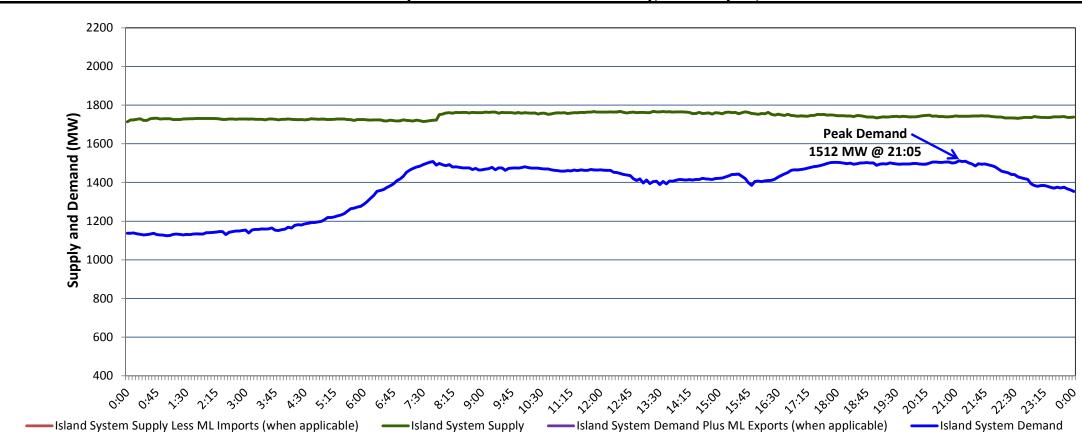
- 1. Generation outages for running and corrective maintenance are included. These are not unusual for power system operations. They generally do not impact customer supply. The power system operators schedule outages to system equipment whenever possible to coincide with periods when customer demands are low and sufficient supply reserves are available. However, from time to time equipment outages are necessary and reserves may be impacted.
- 2. Due to the Island System having no synchronous connections to the larger North American grid, when there is a sudden loss of large generating units some customer's load must be interrupted for short periods to bring generation output equal to customer demand. This automatic action of power system protection, referred to as under frequency load shedding, is necessary to ensure the integrity and reliability of system equipment. Under frequency events typically occur 5 to 8 times per year on the Island Interconnected System and the resultant customer load interruptions are generally less than 30 minutes.
- 3. As of 0800 Hours.
- 4. Gross output including station service at Holyrood (24.5 MW) and improved NLH hydraulic output due to water levels (35 MW).
- 5. Gross output from all Island sources (including Note 4).
- 6. NLH Power Purchases include: CBPP Co-Gen, Nalcor Exploits, Rattle Brook, Star Lake, Wind Generation, Vale capacity assistance (when applicable).
- 7. Adjusted for CBP&P, Vale and Praxair interruptible load, Maritime Link Exports and the impact of voltage reduction (when applicable).

	Section 3 Island Peak Demand Information Previous Day Actual Peak and Current Day	_	
Mon, Jan 22, 2018	Actual Island Peak Demand ⁹	17:25	1,545 MW
Tue, Jan 23, 2018	Forecast Island Peak Demand		1,605 MW

Notes: 9. Island Demand / ML Exports (where applicable) is supplied by NLH generation and purchases, plus generation owned and operated by Newfoundland Power and Corner Brook Pulp & Paper (Deer Lake Power, DLP).

Newfoundland Labrador Hydro (NLH) Supply and Demand Status Report Filed Wednesday, February 14, 2018





Supply Notes For February 13, 2018

1,2

- As of 2115 hours, January 04, 2018, Stephenville Gas Turbine available at 25 MW (50 MW).
- As of 1204 hours, February 03, 2018, Holyrood Unit 1 unavailable 70 MW (170 MW).
- C As of 1550 hours, February 08, 2018, Holyrood Unit 2 available at 127 MW (170 MW).
- At 0752 hours, February 13, 2018, Holyrood Unit 3 available at 103 MW (150 MW).

Section 2 Island Interconnected Supply and Demand Temperature Island System Daily Peak Island System Outlook³ Wed, Feb 14, 2018 (°C) Seven-Day Forecast Demand (MW) **Evening Forecast** Adjusted['] Morning Available Island System Supply:5 Wednesday, February 14, 2018 1,720 1,670 MW -11 -3 1,402 NLH Generation: Thursday, February 15, 2018 1,410 MW 1,445 1,248 -1 NLH Power Purchases:⁶ Friday, February 16, 2018 -2 1,375 1,263 105 MW 1 Saturday, February 17, 2018 0 -9 1,600 1,490 Maritime Link Imports: MW Sunday, February 18, 2018 -10 -8 1,505 1,367 Other Island Generation: 205 MW -11 °C °C Monday, February 19, 2018 1,332 Current St. John's Temperature & Windchill: -21 -7 -4 1,490 7-Day Island Peak Demand Forecast: Tuesday, February 20, 2018 1,605

Supply Notes For February 14, 2018

At 0749 hours, February 14, 2018, Holyrood Unit 2 available at 124 MW (170 MW).

At 0749 hours, February 14, 2018, Holyrood Unit 3 available at 110 MW (150 MW).

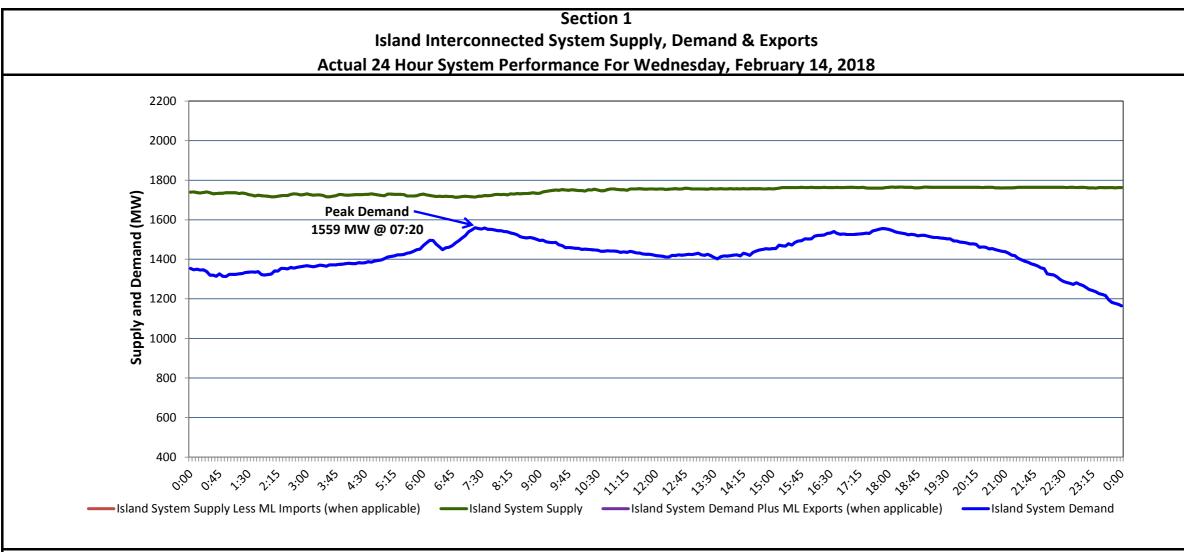
Notes:

- 1. Generation outages for running and corrective maintenance are included. These are not unusual for power system operations. They generally do not impact customer supply. The power system operators schedule outages to system equipment whenever possible to coincide with periods when customer demands are low and sufficient supply reserves are available. However, from time to time equipment outages are necessary and reserves may be impacted.
- 2. Due to the Island System having no synchronous connections to the larger North American grid, when there is a sudden loss of large generating units some customer's load must be interrupted for short periods to bring generation output equal to customer demand. This automatic action of power system protection, referred to as under frequency load shedding, is necessary to ensure the integrity and reliability of system equipment. Under frequency events typically occur 5 to 8 times per year on the Island Interconnected System and the resultant customer load interruptions are generally less than 30 minutes.
- 3. As of 0800 Hours.
- 4. Gross output including station service at Holyrood (24.5 MW) and improved NLH hydraulic output due to water levels (35 MW).
- 5. Gross output from all Island sources (including Note 4).
- 6. NLH Power Purchases include: CBPP Co-Gen, Nalcor Exploits, Rattle Brook, Star Lake, Wind Generation, Vale capacity assistance (when applicable).
- 7. Adjusted for CBP&P, Vale and Praxair interruptible load, Maritime Link Exports and the impact of voltage reduction (when applicable).

	Section 3 Island Peak Demand Information Previous Day Actual Peak and Current Day I		
Tue, Feb 13, 2018	Actual Island Peak Demand ⁸	21:05	1,512 MW
Wed, Feb 14, 2018	Forecast Island Peak Demand		1,670 MW

Notes: 8. Island Demand / ML Exports (where applicable) is supplied by NLH generation and purchases, plus generation owned and operated by Newfoundland Power and Corner Brook Pulp & Paper (Deer Lake Power, DLP).

Newfoundland Labrador Hydro (NLH) Supply and Demand Status Report Filed Thursday, February 15, 2018



Supply Notes For February 14, 2018

1,2

- As of 2115 hours, January 04, 2018, Stephenville Gas Turbine available at 25 MW (50 MW).
- As of 1204 hours, February 03, 2018, Holyrood Unit 1 unavailable 70 MW (170 MW).
- At 0749 hours, February 14, 2018, Holyrood Unit 2 available at 124 MW (170 MW).
- At 0749 hours, February 14, 2018, Holyrood Unit 3 available at 110 MW (150 MW).

Section 2 Island Interconnected Supply and Demand									
Thu, Feb 15, 2018	Island System Outlook ³		3	Seven-Day Forecast	1 .	Temperature (°C)		Island System Daily Peak Demand (MW)	
					Morning	Evening	Forecast	Adjusted ⁷	
Available Island System Supply:5	1,	,720	MW	Thursday, February 15, 2018	-1	-1	1,380	1,263	
NLH Generation: ⁴	1,	,410	MW	Friday, February 16, 2018	-1	2	1,365	1,214	
NLH Power Purchases: ⁶		95	MW	Saturday, February 17, 2018	-1	-8	1,605	1,495	
Maritime Link Imports:		-	MW	Sunday, February 18, 2018	-10	-8	1,495	1,387	
Other Island Generation:		215	MW	Monday, February 19, 2018	-5	-6	1,500	1,391	
Current St. John's Temperature & Windchill:	-1 °C	-6	°C	Tuesday, February 20, 2018	-7	-3	1,520	1,317	
7-Day Island Peak Demand Forecast:	1,	,690	MW	Wednesday, February 21, 2018	-1	-13	1,690	1,579	

Supply Notes For February 15, 2018

Notes:

- 1. Generation outages for running and corrective maintenance are included. These are not unusual for power system operations. They generally do not impact customer supply. The power system operators schedule outages to system equipment whenever possible to coincide with periods when customer demands are low and sufficient supply reserves are available. However, from time to time equipment outages are necessary and reserves may be impacted.
- 2. Due to the Island System having no synchronous connections to the larger North American grid, when there is a sudden loss of large generating units some customer's load must be interrupted for short periods to bring generation output equal to customer demand. This automatic action of power system protection, referred to as under frequency load shedding, is necessary to ensure the integrity and reliability of system equipment. Under frequency events typically occur 5 to 8 times per year on the Island Interconnected System and the resultant customer load interruptions are generally less than 30 minutes.
- 3. As of 0800 Hours.
- 4. Gross output including station service at Holyrood (24.5 MW) and improved NLH hydraulic output due to water levels (35 MW).
- 5. Gross output from all Island sources (including Note 4).
- 6. NLH Power Purchases include: CBPP Co-Gen, Nalcor Exploits, Rattle Brook, Star Lake, Wind Generation, Vale capacity assistance (when applicable).
- 7. Adjusted for CBP&P, Vale and Praxair interruptible load, Maritime Link Exports and the impact of voltage reduction (when applicable).

Section 3 Island Peak Demand Information Previous Day Actual Peak and Current Day Forecast Peak				
Wed, Feb 14, 2018	Actual Island Peak Demand ⁸	07:20	1,559 MW	
Thu, Feb 15, 2018	Forecast Island Peak Demand		1,380 MW	

Notes: 8. Island Demand / ML Exports (where applicable) is supplied by NLH generation and purchases, plus generation owned and operated by Newfoundland Power and Corner Brook Pulp & Paper (Deer Lake Power, DLP).



Hydro Place. 500 Columbus Drive. P.O. Box 12400. St. John's. NL Canada A1B 4K7 t. 709.737.1400 f. 709.737.1800 www.nlh.nl.ca

May 30, 2018

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

Attention:

Ms. Cheryl Blundon

Director of Corporate Services & Board Secretary

Dear Ms. Blundon:

Re: Newfoundland and Labrador Hydro – Capacity Assistance Report Corner Brook Pulp

and Paper

Please find enclosed the original and nine (9) copies of Newfoundland and Labrador Hydro's Capacity Assistance Report – Winter 2017-2018 outlining the dates, times, duration and system conditions, including generation available and calculation of system reserve, under which capacity assistance was requested, the capacity assistance requested and provided, and the capacity and variable payments made.

We trust the foregoing is satisfactory. If you have any questions or comments, please contact the undersigned.

Yours truly,

NEWFOUNDLAND AND LABRADOR HYDRO

Michael S. Ladha

Legal Counsel & Assistant Corporate Secretary

MSL/skc

cc: Gerard Hayes – Newfoundland Power Paul Coxworthy – Stewart McKelvey Dennis Browne, Q.C. – Browne Fitzgerald Morgan & Avis

Danny Dumaresque

ecc: Denis Fleming- Cox & Palmer

Larry Bartlett - Teck Resources Ltd.

Roberta Frampton Benefiel – Grand Riverkeeper® Labrador

PUB-NLH-044, Attachment 2 Reliability and Resource Adequacy Study Page 2 of 31

Capacity Assistance Report

Corner Brook Pulp and Paper

Winter 2017-2018

May 30, 2018

A Report to the Board of Commissioners of Public Utilities



Table of Contents

Backg	round1
1.0	Introduction
2.0	Capacity Assistance Operating Experience - Summary
3.0	Capacity Assistance Requests Winter 2017-2018 – Corner Brook Pulp and Paper
3.1	December 2, 20173
3.2	December 27, 20174
3.3	January 22, 20185
3.4	January 23, 20186
3.5	February 13, 20187
3.6	February 14, 2018
3.7	February 17, 20189
3.8	February 18, 201810
4.0	Capacity Assistance Costs
5.0	Conclusion
Tables	5
Table	1: Summary of Capacity Assistance Requests Corner Brook Pulp and Paper3
Table	2: Summary of Capacity Assistance Costs – Corner Brook Pulp and Paper11
Figure	S S
Figure	1: Supply and Demand Status Report for December 2, 20174
Figure	2: Supply and Demand Status Report for December 27, 2018
Figure	3: Supply and Demand Status Report for January 22, 20186
Figure	4: Supply and Demand Status Report for January 23, 2018
Figure	5: Supply and Demand Status Report for February 13, 2018
Figure	6: Supply and Demand Status Report for February 14, 20189
Figure	7: Supply and Demand Status Report for February 17, 2018
Figure	8: Supply and Demand Status Report for February 18, 2018

PUB-NLH-044, Attachment 2 Reliability and Resource Adequacy Study Page 5 of 31

Capacity Assistance Report Corner Brook Pulp and Paper Winter 2017-2018

Appendices

Appendix A: Summary of Capacity Assistance Agreements

Appendix B: Capacity Assistance Requests - Corner Brook Pulp and Paper

Appendix C: Supply and Demand Reports

1 Background

- 2 Newfoundland and Labrador Hydro (Hydro) had four capacity assistance agreements in place
- 3 for winter 2017-2018 with industrial customers; one with Corner Brook Pulp and Paper Limited
- 4 (CBPP), two with Vale Newfoundland and Labrador Limited (Vale), and one with Praxair Canada
- 5 Inc. (Praxair).
- 6
- 7 This report provides the following for winter 2017-2018 for Corner Brook Pulp and Paper:
- 8 i) the capacity assistance requested and provided, including dates, times, and duration;
- 9 ii) the system conditions at the time of the capacity assistance request, including generation available and calculation of system reserve; and
- 11 iii) payments made.

12

- 13 A summary of the key terms and conditions of Hydro's capacity assistance agreements with
- 14 Corner Brook Pulp and Paper is attached as Appendix A.

- Details on the use of the capacity assistance agreements with Vale and Praxair can be found in
- 17 Hydro's report entitled "Capacity Assistance Report Vale and Praxair Winter 2017-2018"
- 18 filed with the Board on April 16, 2018, as per P.U. 55(2016) and P.U. 3(2017).

1.0 Introduction

1

2 Capacity assistance arrangements are used as a means to minimize disruptions to customers in 3 the event of a contingency or to maintain sufficient level of operating reserves for reliable 4 operation of the electrical system. This support is normally requested during times of high or 5 peak customer demand or instances where there are issues with generation or regional 6 transmission during the winter operating season. 7 8 Hydro has one capacity assistance agreement with Corner Brook Pulp and Paper. In Board 9 Order P.U. 34(2017), on October 31, 2017, the Board approved a revised capacity assistance 10 agreement with Corner Brook Pulp and Paper Limited, effective as of November 1, 2017, which 11 provides for up to 90 MW of winter capacity assistance to Hydro. The revised agreement 12 provides: (i) operational flexibility for six months of the year instead of four months; (ii) 13 improved response time with a 10-minute notification period instead of 20 minutes; and (iii) increased security for long-term planning due to the extended term. The revised agreement 14 15 combines the previous Capacity Assistance Agreements into one single revised agreement (the 16 "Revised Capacity Assistance Agreement"), and provides 90 MW of capacity assistance to Hydro, and extends the term to the earlier of April 30, 2022, or the commissioning of the 17 18 Muskrat Falls Generating Plant. 19 20 In accordance with Board direction, this report summarizes the details and costs associated 21 with Hydro's use of the capacity assistance agreement with Corner Brook Pulp and Paper from 22 November 1, 2017 to April 30, 2018.

1 2.0 Capacity Assistance Operating Experience - Summary

- 2 During the winter of 2017-2018, Hydro made nine requests¹ for capacity assistance from Corner
- 3 Brook Pulp and Paper. A summary of the requests is provided in Table 1.²

Table 1: Summary of Capacity Assistance Requests Corner Brook Pulp and Paper

Agreement	Number of Requests for Assistance	Total Number of Hours of Assistance Provided	Total Capacity Assistance Provided (equivalent kWh)
2017-2018 Corner Brook Pulp and Paper Assistance	9	46 hours	2,489,617kWh

3.0 Capacity Assistance Requests Winter 2017-2018 – Corner Brook Pulp and

5 **Paper**

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6 The following summaries provide an overview of the system conditions and capacity assistance

7 provided during the capacity assistance requested events. Additional details, including start and

8 end times, is attached as Appendix B. For details on system conditions, including actual peak

demand values, please refer to Appendix C for the Supply and Demand Status Reports

applicable to each day, as submitted to the Board.

3.1 December 2, 2017

On December 2, 2017, Island generating capacity was reduced due to Holyrood Unit 1 and

Hinds Lake Unit being unavailable; the Stephenville Gas Turbine was derated due to limitations

posed by the capacity of the leased engine; the Hardwoods Gas Turbine was derated as one

end was unavailable and the spinning reserves outlook for the morning was low. To assist in

maintaining adequate spinning reserves during the morning peak, Hydro standby generation

¹ There was high power testing planned for the Maritime Link from 2200 hours on January 9, 2018 to 0600 hours on January 10, 2018. Additional capacity was needed on the system to ensure system security and reliability during the testing. In order to facilitate this testing Hydro requested an Extended Duration Capacity Assistance for 50 MW for the period. This is consistent with Section 2.05 of the Capacity Assistance Agreement and did not count against Hydro for the number of times the Capacity Assistance Agreement can be enacted. Hydro paid the rates as outlined in section 3.03 of the Capacity Assistance Agreement and then recovered these same charges from Emera. This call for Extended Duration Capacity Assistance is not included in any of the results in the following sections as it was voluntary and costs were flowed through Hydro to Emera.

² Testing resulted in 73 MW of Capacity Assistance available until January 22, 2018, with the full 90 MW available thereafter.

- 1 was operated. In addition, Newfoundland Power was requested to maximize their hydraulic
- 2 generation and Corner Brook Pulp and Paper provided 20 MW of capacity assistance from 0830
- 3 to 1230 hours to support Island spinning reserves throughout the morning period.

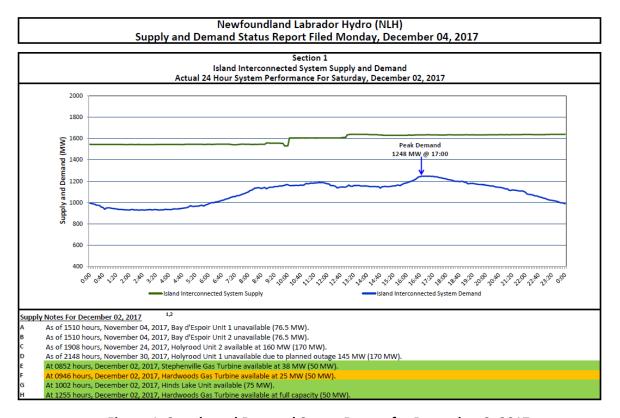


Figure 1: Supply and Demand Status Report for December 2, 2017

4 3.2 December 27, 2017

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On December 27, 2017, with a weather warning in effect for areas of the province, Island generating capacity was reduced by the derations of all Holyrood units due to air supply issues; the Stephenville Gas Turbine was derated due to limitations posed by the capacity of the leased engine; and forecast spinning reserve was low for both the morning and the evening peaks. To assist in maintaining adequate spinning reserves during the morning peak, standby generation was operated. The Upper Salmon unit became unavailable due to frazil ice and Holyrood Unit 3 was further derated by 10 MW in afternoon, prior to the evening peak. A Level 1 alert was forecast for the evening, based on available Island reserve. In addition to starting standby

- 1 generation and requesting capacity assistance from Vale and Praxair, to support Island spinning
- 2 reserves throughout the day and evening periods, Corner Brook Pulp and Paper provided 20
- 3 MW of capacity assistance from 1000 hours to 1600 hours, and 40 MW of capacity assistance
- 4 from 1600 hours to 2200 hours.

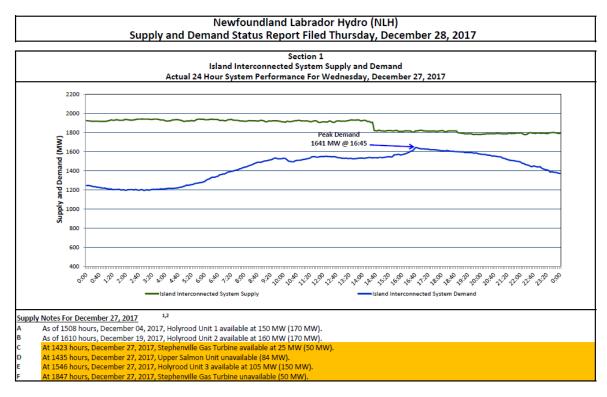


Figure 2: Supply and Demand Status Report for December 27, 2018

3.3 January 22, 2018

- 6 On January 22, 2018, Holyrood Unit 1 was unavailable due to a boiler stop valve leak and Units
 - 2 and 3 were derated due to air supply issues; the Stephenville Gas Turbine capacity was
- 8 reduced to 25 MW due to a vibration issue with the leased engine; and forecast Island reserve
 - for the evening peak was close to that of a Level 2 alert. In addition to operating standby
- 10 generation and requesting capacity assistance from Vale, and to support Island spinning
- 11 reserves, Corner Brook Pulp and Paper provided 90 MW of capacity assistance from 1500 hours
- 12 to 2100 hours.

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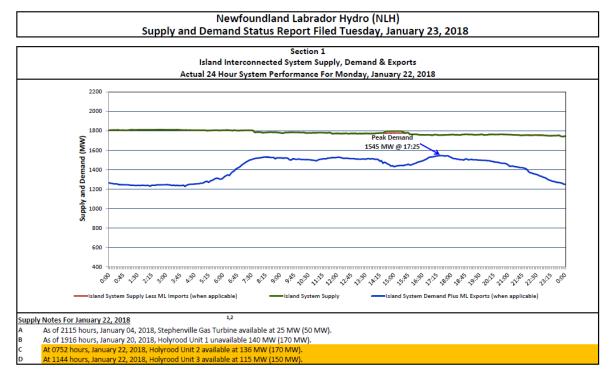


Figure 3: Supply and Demand Status Report for January 22, 2018

3.4 January 23, 2018

- 2 On January 23, 2018, Holyrood Units 2 and 3 were derated due to air supply issues; Holyrood
- 3 Unit 1 was unavailable; the Stephenville Gas Turbine was derated due to limitations posed by
- 4 the capacity of the leased engine and the spinning reserves outlook for the morning was low.
- 5 To assist in maintaining adequate spinning reserves during the morning peak, Hydro standby
- 6 generation was operated. In addition, Newfoundland Power was requested to maximize their
- 7 hydraulic generation and Corner Brook Pulp and Paper provided 90 MW of capacity assistance
- 8 from 0700 hours to 1100 hours to support Island spinning reserves throughout the morning
- 9 period.

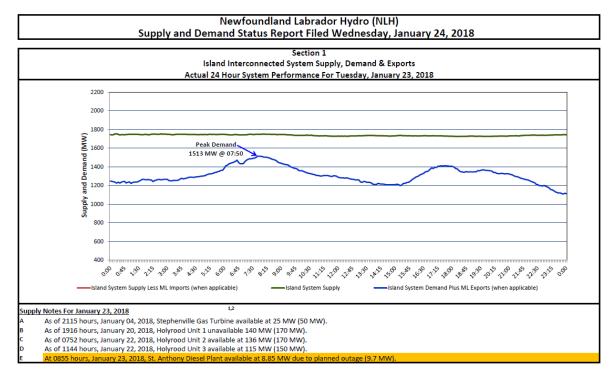


Figure 4: Supply and Demand Status Report for January 23, 2018

1 3.5 February 13, 2018

- 2 On February 13, 2018, Holyrood Unit 1 remained unavailable due to the boiler stop valve leak
- 3 and Units 2 and 3 were derated due to air supply issues; Holyrood Unit 2 was derated to 127
- 4 MW; Holyrood Unit 3 was derated to 103 MW; the Stephenville Gas Turbine remained derated
- 5 to 25 MW and a Level 1 alert was forecast for the evening, based on available Island reserve. In
- 6 addition to operating standby generation and requesting capacity assistance from Vale and
- 7 Praxair, Corner Brook Pulp and Paper provided 90 MW of capacity assistance from 1600 hours
- 8 to 2000 hours.

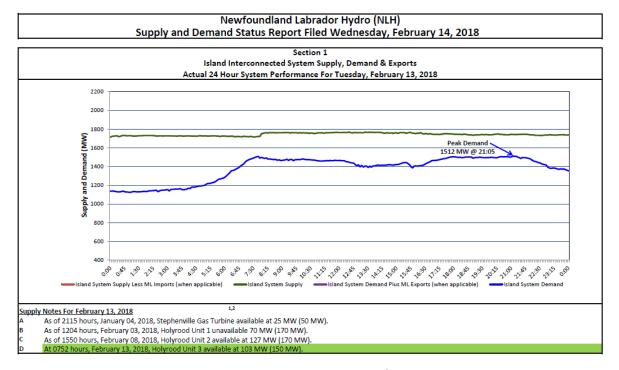


Figure 5: Supply and Demand Status Report for February 13, 2018

1 3.6 February 14, 2018

- 2 On February 14, 2018, Holyrood Unit 1 remained unavailable due to a boiler stop valve leak and
- 3 Units 2 and 3 were derated due to air supply issues; Holyrood Unit 2 was derated to 124 MW
- 4 and Unit 3 was derated to 110 MW; the Stephenville Gas Turbine remained derated to 25 MW;
- 5 and forecast Island reserve for the morning peak was just inside Level 2 alert. In addition to
- 6 starting both Hydro's and Newfoundland Power's standby generation and requesting capacity
- 7 assistance from Vale and Praxair, Corner Brook Pulp and Paper provided 90 MW of capacity
- 8 assistance from 0630 hours to 1230 hours to support Island spinning reserves.

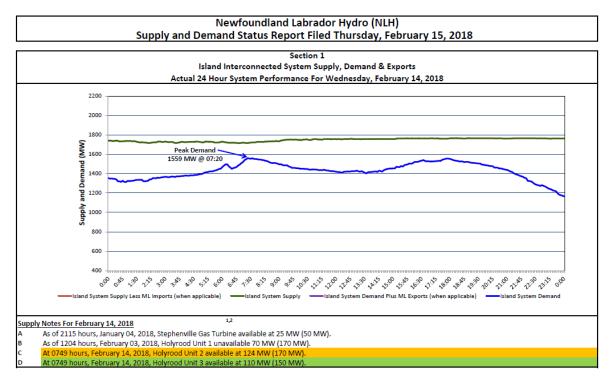


Figure 6: Supply and Demand Status Report for February 14, 2018

3.7 February 17, 2018

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- 2 On February 17, 2018, Holyrood Units 2 and 3 were derated due to air supply issues; Holyrood
- 3 Unit 1 was unavailable; the Stephenville Gas Turbine was derated due to limitations posed by
- 4 the capacity of the leased engine and the spinning reserves outlook for the day was indicated to
- 5 be low for both the morning and the evening peaks. To assist in maintaining adequate spinning
- 6 reserves during the evening peak, Hydro standby generation was operated. In addition,
- 7 Newfoundland Power and Deer Lake Power were requested to maximize their hydraulic
- 8 generation and Newfoundland Power standby generation was operated. Forecast Island
- 9 available reserve for the evening was just outside a Level 1 alert. Corner Brook Pulp and Paper
- 10 provided 40 MW of capacity assistance from 1700 hours to 2300 hours to support Island
- spinning reserves throughout the evening period.

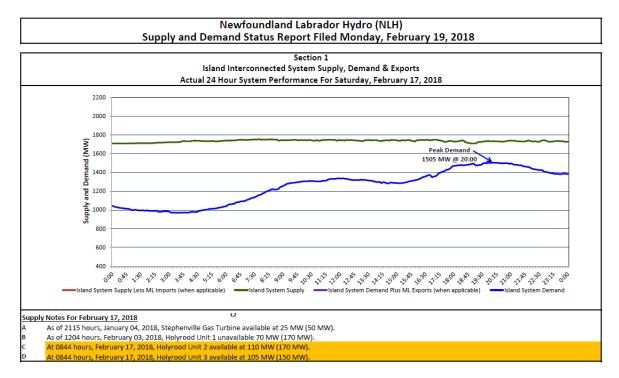


Figure 7: Supply and Demand Status Report for February 17, 2018

3.8 February 18, 2018

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- 2 On February 18, 2018, Holyrood Unit 1 continued to be unavailable; Holyrood Units 2 and 3
- 3 were derated due to air supply issues; the Stephenville Gas Turbine capacity was reduced to 25
- 4 MW due to a lease engine vibration issue; Granite Canal Unit became unavailable in the early
- 5 morning due to frazil ice and forecast Island reserve for the morning peak was just outside a
- 6 Level 1 alert. To assist in maintaining adequate spinning reserves during the morning peak,
- 7 Hydro standby generation was operated. In addition, Newfoundland Power and Deer Lake
- 8 Power were requested to maximize their hydraulic generation and Newfoundland Power
- 9 standby generation was operated. Corner Brook Pulp and Paper provided 40 MW of capacity
- assistance from 0700 hours to 1100 hours to support Island spinning reserves.

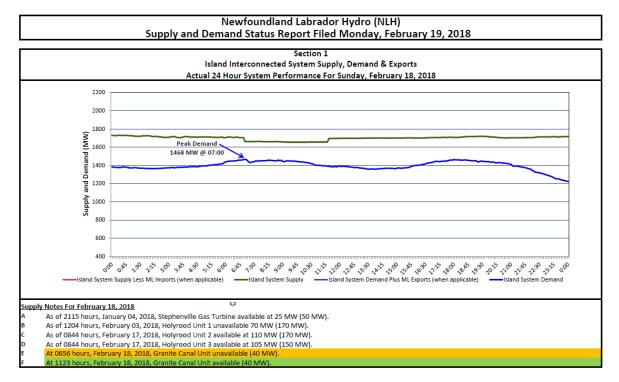


Figure 8: Supply and Demand Status Report for February 18, 2018

1 4.0 Capacity Assistance Costs

- 2 The overall cost of capacity assistance for the 2017-2018 winter season is provided in Table 2.
- 3 Additional details on the contract conditions, including rate structures, are included as
- 4 Appendix A.

Table 2: Summary of Capacity Assistance Costs – Corner Brook Pulp and Paper

Corner Brook Pulp and Paper Capacity Assistance Agreement	Fixed Charge (\$)	•	Total (\$)
Winter 2017-2018	2,355,157	677,138	3,032,295

5 **5.0 Conclusion**

- 6 Hydro made nine capacity assistance requests from Corner Brook Pulp and Paper in Winter
- 7 2017-2018 that helped Hydro ensure reliable service for its customers. While Hydro's existing
- 8 capacity assistance agreements with Vale and Praxair expired at the end of March 2018, Hydro
- 9 continues to evaluate whether these agreements should be continued through interconnection

Capacity Assistance Report - Corner Brook Pulp and Paper Winter 2017-2018

- as part of its focus on customer reliability. The Corner Book Pulp and Paper agreement expires
- 2 on April 30, 2022, or the date of commissioning of the Muskrat Falls Generating Plant,
- 3 whichever is earlier. Corner Brook Pulp and Paper have demonstrated their ability to provide 90
- 4 MW of capacity assistance on a consistent basis through the 2017-2018 winter period.

PUB-NLH-044, Attachment 2 Reliability and Resource Adequacy Study Page 18 of 31

Capacity Assistance Report Corner Brook Pulp and Paper Winter 2017-2018 Appendix A

Appendix A

Summary of Capacity Assistance Agreements

Capacity Assistance Report Corner Brook Pulp and Paper Winter 2017-2018

Appendix A

Table A- 1: Summary of Capacity Assistance Agreements – Corner Brook Pulp and Paper

Contracted	Rate Structure	Conditions
Capacity		
Up to 90 MW in 20 MW increments	Fixed \$4.75/kW per month for each of the six winter months November through April for a total maximum	 Notification Period: 10 minutes Interruption Period: 4 hours (minimum) to 6 hours (maximum) Maximum number of requests: 2 per
i.e. 20 MW, 40 MW, 60 MW, or 90 MW	of \$2,565,00 Variable A minimum of \$0.20 per kW per hour to a maximum of \$0.26 per kw per hour for the maximum assistance provided as determined on the following sliding scale: I. 0 to 7.5 GWh/Winter Period - 90% of GTVC; II. Greater than 7.5 to 100 GWh/Winter Period - 80% of GTVC.	 day, 30 per winter Total Assistance Period: 150 hours per winter Penalties: Three Strike Clause Expiry - April 30, 2022 or the date of commissioning of the Muskrat Falls Generating plant, whichever is earlier Test: Tested annually Revised flexibility for voluntary calls for capacity assistance also contained in contract

³ GTVC = the previous month's Gas Turbine Variable Cost as provided on Corner Brook Pulp and Paper's monthly invoice and expressed as a cost per KWh.

PUB-NLH-044, Attachment 2 Reliability and Resource Adequacy Study Page 20 of 31

Capacity Assistance Report Corner Brook Pulp and Paper Winter 2017-2018
Appendix B

Appendix B

Capacity Assistance Requests: Corner Brook Pulp and Paper

Capacity Assistance Report Corner Brook Pulp and Paper 2017-2018 Appendix B

Date	Start Time	End Time	Duration (hh:mm)	System Generation	System Available	System Spinning	Maximum Capacity	Maximum Capacity
				Available (MW)	Reserve (MW)	Reserve (MW)	Assistance Requested	Assistance Provided
							(MW)	(MM)
December 2, 2017	8:30	12:30	4:00	1534	537	180	20.0	20.0
December 27, 2017	10:00	16:00	00:9	1894	474	140	20.0	20.0
December 27, 2017	16:00	22:00	00:9	1786	328	133	40.0	40.0
January 22, 2018	15:00	21:00	00:9	1768	371	191	90.0	0.06
January 23, 2018	7:00	11:00	4:00	1742	397	176	0.06	90.0
February 13, 2018	16:00	20:00	4:00	1753	417	213	0.06	0.06
February 14, 2018	6:30	12:30	00:9	1727	366	193	90.0	0.06
February 17, 2018	17:00	23:00	00:9	1751	536	138	40.0	40.0
February 18, 2018	7:00	11:00	4:00	1717	375	167	40.0	40.0

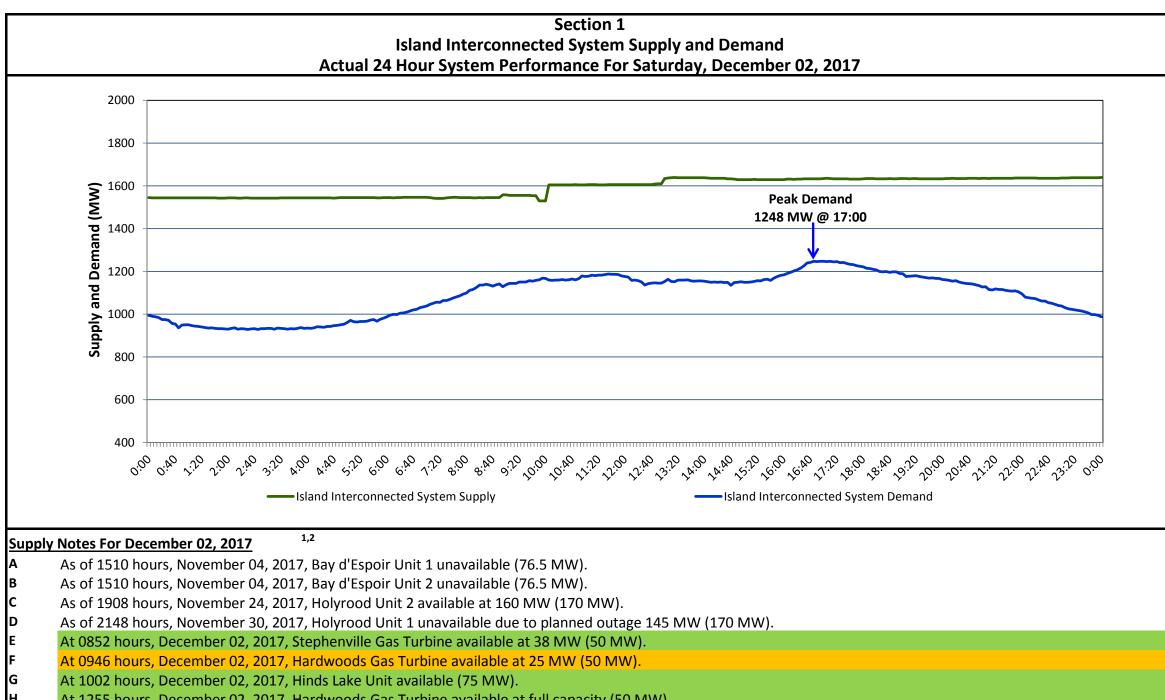
PUB-NLH-044, Attachment 2 Reliability and Resource Adequacy Study Page 22 of 31

Capacity Assistance Report Corner Brook Pulp and Paper Winter 2017-2018 Appendix C

Appendix C

Supply and Demand Reports

Newfoundland Labrador Hydro (NLH) Supply and Demand Status Report Filed Monday, December 04, 2017



At 1255 hours, December 02, 2017, Hardwoods Gas Turbine available at full capacity (50 MW)

		Isla	Section 2 nd Interconnected Supply and Dema	and			
Sun, Dec 03, 2017	sland System Outlo	ook ³	Seven-Day Forecast	Tempe (°	erature C)	Island System Dail (MW	=
				Morning	Evening	Forecast	Adjusted ⁷
Available Island System Supply: ⁵	1,635	MW	Sunday, December 03, 2017	0	1	1,370	1,263
NLH Generation: ⁴	1,350	MW	Monday, December 04, 2017	2	1	1,370	1,263
NLH Power Purchases: ⁶	85	MW	Tuesday, December 05, 2017	1	0	1,345	1,238
Other Island Generation:	200	MW	Wednesday, December 06, 2017	2	3	1,280	1,174
Current St. John's Temperature:	0	°C	Thursday, December 07, 2017	3	4	1,220	1,115
Current St. John's Windchill:	-5	°C	Friday, December 08, 2017	4	1	1,290	1,184
7-Day Island Peak Demand Fored	cast: 1,370	MW	Saturday, December 09, 2017	2	1	1,305	1,199

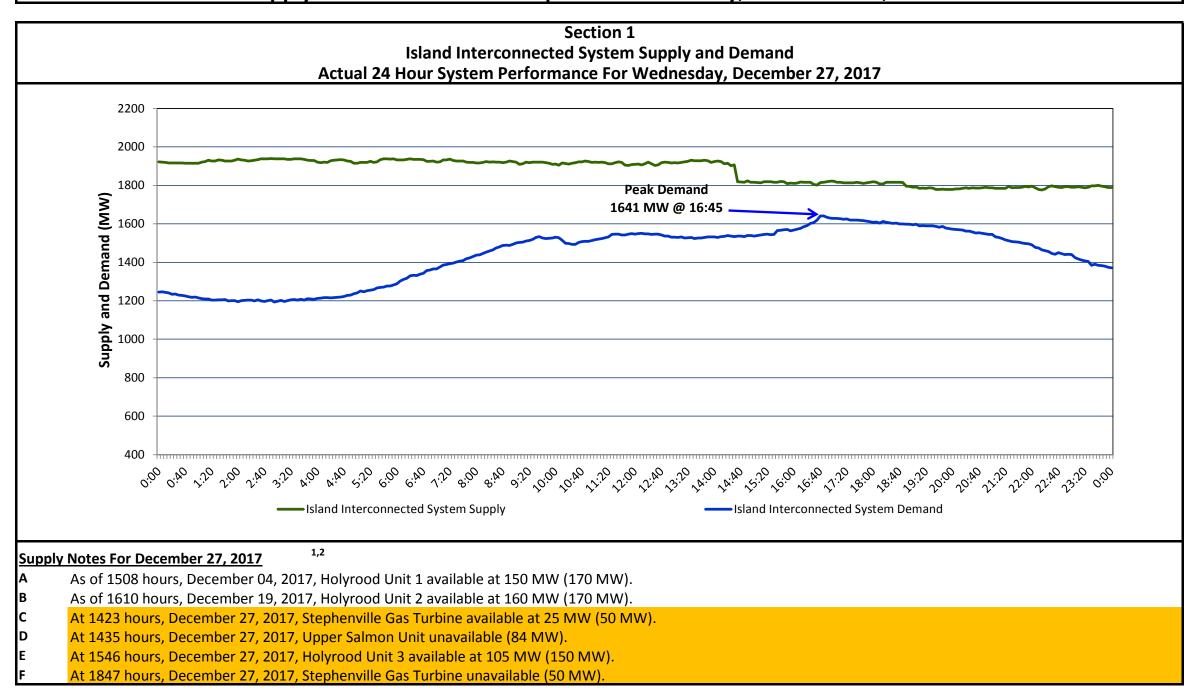
Supply Notes For December 03, 2017

Notes:

- 1. Generation outages for running and corrective maintenance are included. These are not unusual for power system operations. They generally do not impact customer supply. The power system operators schedule outages to system equipment whenever possible to coincide with periods when customer demands are low and sufficient supply reserves are available. However, from time to time equipment outages are necessary and reserves may be impacted.
- 2. Due to the Island Interconnected System being isolated from the larger North American grid, when there is a sudden loss of large generating units some customer's load must be interrupted for short periods to bring generation output equal to customer demand. This automatic action of power system protection, referred to as under frequency load shedding, is necessary to ensure the integrity and reliability of system equipment. Under frequency events typically occur 5 to 8 times per year on the Island Interconnected System and the resultant customer load interruptions are generally less than 30 minutes.
- 3. As of 0800 Hours.
- 4. Gross output including station service at Holyrood (24.5 MW) and improved NLH hydraulic output due to water levels (35 MW).
- 5. Gross output from all Island sources (including Note 4).
- 6. NLH Power Purchases include: CBPP Co-Gen, Nalcor Exploits, Rattle Brook, Star Lake, Vale capacity assistance (when applicable), and Wind Generation.
- 7. Adjusted for CBP&P and Vale and Praxair interruptible load and the impact of voltage reduction, when applicable.

	Section Section Island Peak Dema Previous Day Actual Peak and	and Information	
Sat, Dec 02, 2017	Actual Island Peak Demand ⁸	17:00	1,248 MW
Sun, Dec 03, 2017	Forecast Island Peak Demand		1,370 MW

Newfoundland Labrador Hydro (NLH) Supply and Demand Status Report Filed Thursday, December 28, 2017



		Isla	Section 2 and Del	mand			
Thu, Dec 28, 2017 Island System		ook ³	Seven-Day Forecast	Tempe (°	rature C)	Island System Dail (MW	
				Morning	Evening	Forecast	Adjusted ⁷
Available Island System Supply: ⁵	1,785	MW	Thursday, December 28, 2017	-5	-3	1,535	1,426
NLH Generation: ⁴	1,485	MW	Friday, December 29, 2017	-3	-4	1,545	1,436
NLH Power Purchases: ⁶	110	MW	Saturday, December 30, 2017	-7	-2	1,470	1,362
Other Island Generation:	190	MW	Sunday, December 31, 2017	-4	-1	1,495	1,387
Current St. John's Temperature:	-6	°C	Monday, January 01, 2018	-3	-4	1,530	1,421
Current St. John's Windchill:	-18	°C	Tuesday, January 02, 2018	-5	-4	1,545	1,436
7-Day Island Peak Demand Forecast:	1,545	MW	Wednesday, January 03, 2018	-5	-4	1,510	1,401

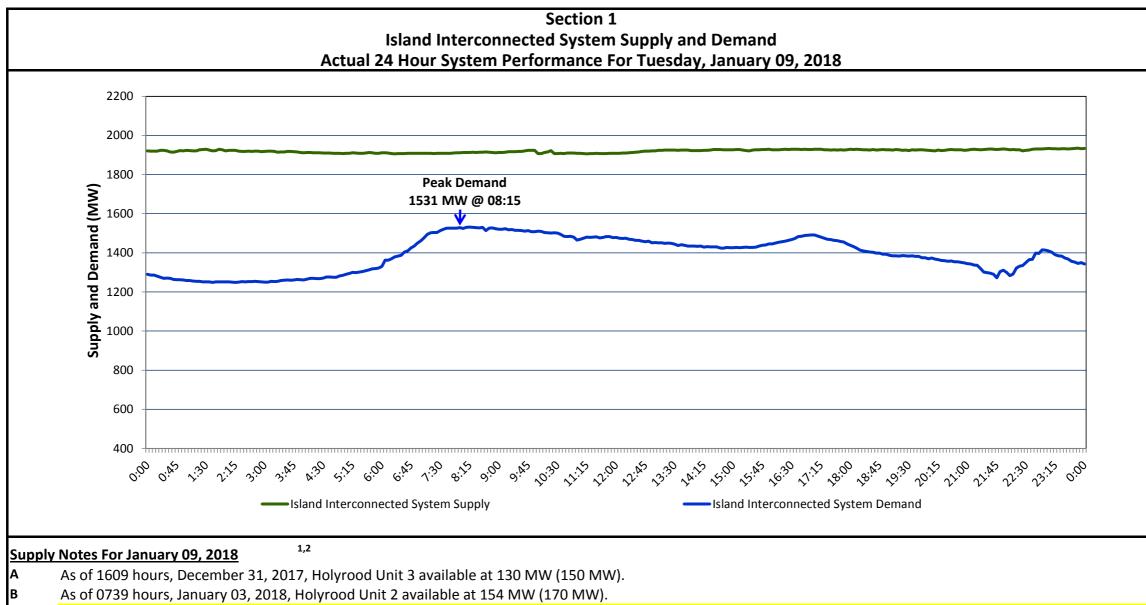
Supply Notes For December 28, 2017

Notes:

- 1. Generation outages for running and corrective maintenance are included. These are not unusual for power system operations. They generally do not impact customer supply. The power system operators schedule outages to system equipment whenever possible to coincide with periods when customer demands are low and sufficient supply reserves are available. However, from time to time equipment outages are necessary and reserves may be impacted.
- 2. Due to the Island Interconnected System being isolated from the larger North American grid, when there is a sudden loss of large generating units some customer's load must be interrupted for short periods to bring generation output equal to customer demand. This automatic action of power system protection, referred to as under frequency load shedding, is necessary to ensure the integrity and reliability of system equipment. Under frequency events typically occur 5 to 8 times per year on the Island Interconnected System and the resultant customer load interruptions are generally less than 30 minutes.
- 3. As of 0800 Hours.
- 4. Gross output including station service at Holyrood (24.5 MW) and improved NLH hydraulic output due to water levels (35 MW).
- 5. Gross output from all Island sources (including Note 4).
- 6. NLH Power Purchases include: CBPP Co-Gen, Nalcor Exploits, Rattle Brook, Star Lake, Wind Generation, Vale capacity assistance and Maritime Link Import (when applicable).
- 7. Adjusted for CBP&P and Vale and Praxair interruptible load, the impact of voltage reduction and Maritime Link Exports (when applicable).

	Section	on 3	
	Island Peak Dema	nd Information	
	Previous Day Actual Peak and	Current Day Forecast Peak	
Wed, Dec 27, 2017	Actual Island Peak Demand ⁸	16:45	1,641 MW
Thu, Dec 28, 2017	Forecast Island Peak Demand		1,535 MW

Newfoundland Labrador Hydro (NLH) Supply and Demand Status Report Filed Wednesday, January 10, 2018 (Revised - January 12, 2018)



- As of 2115 hours, January 04, 2018, Stephenville Gas Turbine available at 25 MW (50 MW).
- As of 0815 hours, January 08, 2018, Holyrood Unit 1 available at 148 MW (170 MW).

3

		Islaı	Section 2 nd Interconnected Supply and De	mand			
Wed, Jan 10, 2018 Island	System Outl	ook ³	Seven-Day Forecast		erature C)	Island System Dail (MW	-
				Morning	Evening	Forecast	Adjusted ⁷
Available Island System Supply:5	1,925	MW	Wednesday, January 10, 2018	-4	-8	1,640	1,530
NLH Generation: ⁴	1,610	MW	Thursday, January 11, 2018	-8	1	1,535	1,426
NLH Power Purchases: ⁶	110	MW	Friday, January 12, 2018	3	7	1,315	1,209
Other Island Generation:	205	MW	Saturday, January 13, 2018	7	8	1,315	1,209
Current St. John's Temperature:	-5	°C	Sunday, January 14, 2018	8	8	1,310	1,204
Current St. John's Windchill:	-16	°C	Monday, January 15, 2018	3	2	1,525	1,416
7-Day Island Peak Demand Forecast:	1,640	MW	Tuesday, January 16, 2018	2	-3	1,480	1,372

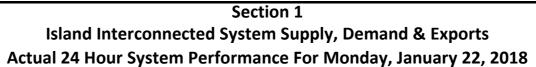
Supply Notes For January 10, 2018

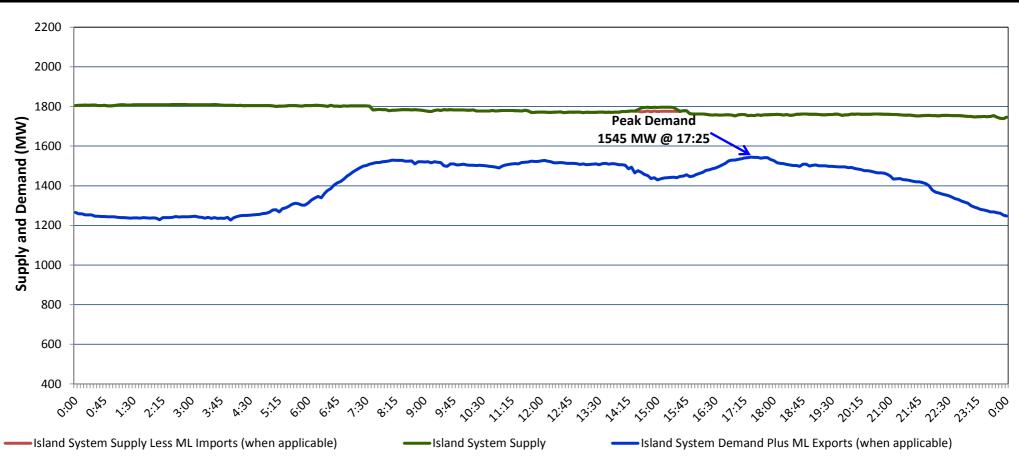
Notes:

- 1. Generation outages for running and corrective maintenance are included. These are not unusual for power system operations. They generally do not impact customer supply. The power system operators schedule outages to system equipment whenever possible to coincide with periods when customer demands are low and sufficient supply reserves are available. However, from time to time equipment outages are necessary and reserves may be impacted.
- 2. Due to the Island Interconnected System being isolated from the larger North American grid, when there is a sudden loss of large generating units some customer's load must be interrupted for short periods to bring generation output equal to customer demand. This automatic action of power system protection, referred to as under frequency load shedding, is necessary to ensure the integrity and reliability of system equipment. Under frequency events typically occur 5 to 8 times per year on the Island Interconnected System and the resultant customer load interruptions are generally less than 30 minutes.
- 3. As of 0800 Hours
- 4. Gross output including station service at Holyrood (24.5 MW) and improved NLH hydraulic output due to water levels (35 MW).
- 5. Gross output from all Island sources (including Note 4).
- 6. NLH Power Purchases include: CBPP Co-Gen, Nalcor Exploits, Rattle Brook, Star Lake, Wind Generation, Vale capacity assistance and Maritime Link Import (when applicable).
- 7. Adjusted for CBP&P and Vale and Praxair interruptible load, the impact of voltage reduction and Maritime Link Exports (when applicable).

	Section Sectio	and Information	
Tue, Jan 09, 2018	Actual Island Peak Demand ⁸	08:15	1,531 MW
Wed, Jan 10, 2018	Forecast Island Peak Demand		1,640 MW

Newfoundland Labrador Hydro (NLH) Supply and Demand Status Report Filed Tuesday, January 23, 2018





Supply Notes For January 22, 2018

1,2

- As of 2115 hours, January 04, 2018, Stephenville Gas Turbine available at 25 MW (50 MW).
- As of 1916 hours, January 20, 2018, Holyrood Unit 1 unavailable 140 MW (170 MW).
- At 0752 hours, January 22, 2018, Holyrood Unit 2 available at 136 MW (170 MW).
- At 1144 hours, January 22, 2018, Holyrood Unit 3 available at 115 MW (150 MW).

Section 2 Island Interconnected Supply and Demand **Temperature Island System Daily** Island System Outlook³ Tue, Jan 23, 2018 (°C) Seven-Day Forecast Peak Demand (MW) Forecast Adjusted Morning **Evening** Available Island System Supply:5 1,745 MW Tuesday, January 23, 2018 -8 -5 1,605 1,391 NLH Generation:4 1,430 MW Wednesday, January 24, 2018 0 5 1,440 1,268 NLH Power Purchases:⁶ Thursday, January 25, 2018 0 1,510 1,401 110 MW -4 -6 -5 1,372 Maritime Link Imports: MWFriday, January 26, 2018 1,540 -9 -7 1,595 1,485 Other Island Generation: Saturday, January 27, 2018 205 MW Current St. John's Temperature & Windchill: -8 °C °C Sunday, January 28, 2018 -4 1,510 1,327 -16 7-Day Island Peak Demand Forecast: 1,605 Monday, January 29, 2018 -2 1,357 1,465

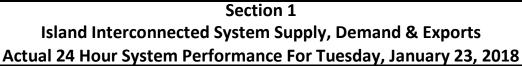
Supply Notes For January 23, 2018

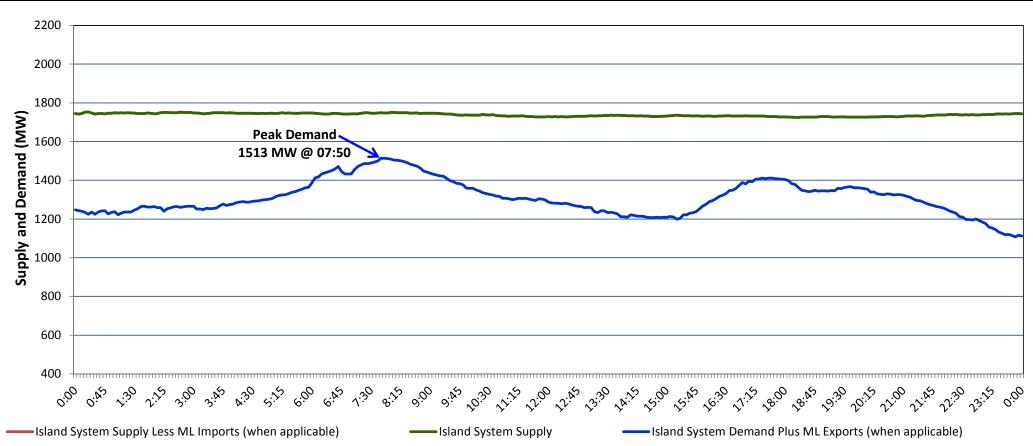
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- 4. Gross output including station service at Holyrood (24.5 MW) and improved NLH hydraulic output due to water levels (35 MW).
- 5. Gross output from all Island sources (including Note 4).
- 6. NLH Power Purchases include: CBPP Co-Gen, Nalcor Exploits, Rattle Brook, Star Lake, Wind Generation, Vale capacity assistance (when applicable).
- 7. Adjusted for CBP&P, Vale and Praxair interruptible load, Maritime Link Exports and the impact of voltage reduction (when applicable).

	Section 3 Island Peak Demand Informati	ion	
	Previous Day Actual Peak and Current Day		
Mon, Jan 22, 2018	Actual Island Peak Demand ⁹	17:25	1,545 MW
Tue, Jan 23, 2018	Forecast Island Peak Demand		1,605 MW

Newfoundland Labrador Hydro (NLH) Supply and Demand Status Report Filed Wednesday, January 24, 2018





Supply Notes For January 23, 2018

1,2

- As of 2115 hours, January 04, 2018, Stephenville Gas Turbine available at 25 MW (50 MW).
- B As of 1916 hours, January 20, 2018, Holyrood Unit 1 unavailable 140 MW (170 MW).
- As of 0752 hours, January 22, 2018, Holyrood Unit 2 available at 136 MW (170 MW).
- As of 1144 hours, January 22, 2018, Holyrood Unit 3 available at 115 MW (150 MW).
 - At 0855 hours, January 23, 2018, St. Anthony Diesel Plant available at 8.85 MW due to planned outage (9.7 MW)

Section 2 Island Interconnected Supply and Demand Temperature Island System Daily Peak Island System Outlook³ Wed, Jan 24, 2018 Seven-Day Forecast (°C) Demand (MW) Adjusted⁷ **Forecast** Morning **Evening** Available Island System Supply:5 1,430 1,322 1,745 MW Wednesday, January 24, 2018 Thursday, January 25, 2018 NLH Generation:4 1,570 1,430 MW -1 -5 1,461 Friday, January 26, 2018 NLH Power Purchases:⁶ 115 MW -6 -6 1,535 1,401 Maritime Link Imports: MW Saturday, January 27, 2018 -11 -9 1,610 1,500 1,303 Other Island Generation: Sunday, January 28, 2018 Current St. John's Temperature & Windchill: Monday, January 29, 2018 -9 -1 1,490 1,382 7-Day Island Peak Demand Forecast: Tuesday, January 30, 2018 1 1,610 MW 1,435 1,327

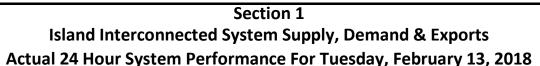
Supply Notes For January 24, 2018

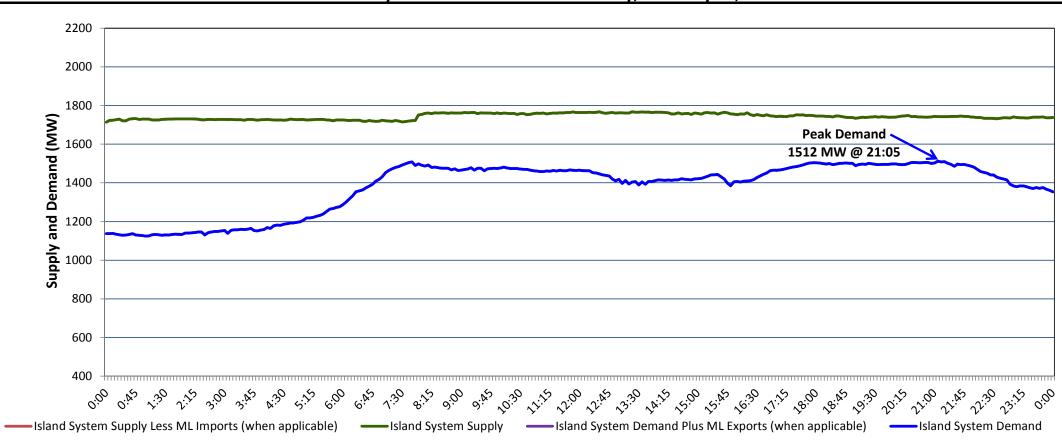
Notes:

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- 3. As of 0800 Hours.
- 4. Gross output including station service at Holyrood (24.5 MW) and improved NLH hydraulic output due to water levels (35 MW).
- 5. Gross output from all Island sources (including Note 4).
- 6. NLH Power Purchases include: CBPP Co-Gen, Nalcor Exploits, Rattle Brook, Star Lake, Wind Generation, Vale capacity assistance (when applicable).
- 7. Adjusted for CBP&P, Vale and Praxair interruptible load, Maritime Link Exports and the impact of voltage reduction (when applicable).

	Section 3 Island Peak Demand Information Previous Day Actual Peak and Current Day		
Tue, Jan 23, 2018	Actual Island Peak Demand ⁹	07:50	1,513 MW
Wed, Jan 24, 2018	Forecast Island Peak Demand		1,430 MW

Newfoundland Labrador Hydro (NLH) Supply and Demand Status Report Filed Wednesday, February 14, 2018





Supply Notes For February 13, 2018

1,2

- As of 2115 hours, January 04, 2018, Stephenville Gas Turbine available at 25 MW (50 MW).
- B As of 1204 hours, February 03, 2018, Holyrood Unit 1 unavailable 70 MW (170 MW).
- As of 1550 hours, February 08, 2018, Holyrood Unit 2 available at 127 MW (170 MW).
- At 0752 hours, February 13, 2018, Holyrood Unit 3 available at 103 MW (150 MW).

	Island Inte		ection 2 ted Supply and Demand				
Wed, Feb 14, 2018	Island System Outlook	3	Seven-Day Forecast		erature C)	Island Syster Deman	m Daily Peak d (MW)
				Morning	Evening	Forecast	Adjusted ⁷
Available Island System Supply: ⁵	1,720	MW	Wednesday, February 14, 2018	-11	-3	1,670	1,402
NLH Generation: ⁴	1,410	MW	Thursday, February 15, 2018	-1	-1	1,445	1,248
NLH Power Purchases: ⁶	105	MW	Friday, February 16, 2018	-2	1	1,375	1,263
Maritime Link Imports:	-	MW	Saturday, February 17, 2018	0	-9	1,600	1,490
Other Island Generation:	205	MW	Sunday, February 18, 2018	-10	-8	1,505	1,367
Current St. John's Temperature & Windchill:	-11 °C -21	°C	Monday, February 19, 2018	-7	-4	1,490	1,332
7-Day Island Peak Demand Forecast:	1,670	MW	Tuesday, February 20, 2018	-11	-2	1,605	1,387

Supply Notes For February 14, 2018

At 0749 hours, February 14, 2018, Holyrood Unit 2 available at 124 MW (170 MW).

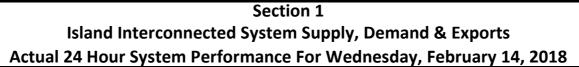
At 0749 hours, February 14, 2018, Holyrood Unit 3 available at 110 MW (150 MW).

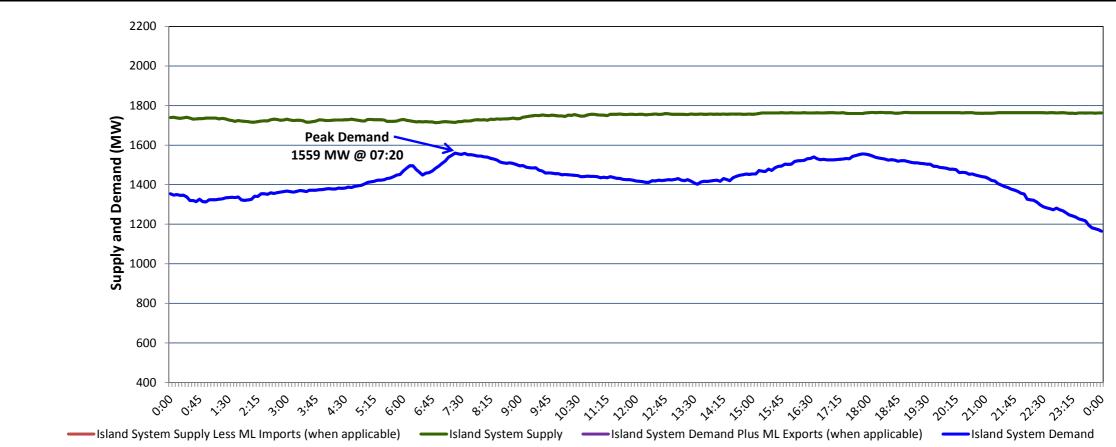
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- 3. As of 0800 Hours.
- 4. Gross output including station service at Holyrood (24.5 MW) and improved NLH hydraulic output due to water levels (35 MW).
- 5. Gross output from all Island sources (including Note 4).
- 6. NLH Power Purchases include: CBPP Co-Gen, Nalcor Exploits, Rattle Brook, Star Lake, Wind Generation, Vale capacity assistance (when applicable).
- 7. Adjusted for CBP&P, Vale and Praxair interruptible load, Maritime Link Exports and the impact of voltage reduction (when applicable).

	Section 3			
Island Peak Demand Information				
Previous Day Actual Peak and Current Day Forecast Peak				
Tue, Feb 13, 2018	Actual Island Peak Demand ⁸	21:05	1,512 MW	
Wed, Feb 14, 2018	Forecast Island Peak Demand		1,670 MW	

Newfoundland Labrador Hydro (NLH) Supply and Demand Status Report Filed Thursday, February 15, 2018





Supply Notes For February 14, 2018

1,2

- As of 2115 hours, January 04, 2018, Stephenville Gas Turbine available at 25 MW (50 MW).
- As of 1204 hours, February 03, 2018, Holyrood Unit 1 unavailable 70 MW (170 MW).
 - At 0749 hours, February 14, 2018, Holyrood Unit 2 available at 124 MW (170 MW).
- At 0749 hours, February 14, 2018, Holyrood Unit 3 available at 110 MW (150 MW).

Section 2 Island Interconnected Supply and Demand **Temperature Island System Daily** Island System Outlook³ Thu, Feb 15, 2018 Seven-Day Forecast (°C) Peak Demand (MW) Forecast Adjusted Morning **Evening** Available Island System Supply:5 1,720 MW Thursday, February 15, 2018 1,380 1,263 -1 -1 NLH Generation: 1,410 MW Friday, February 16, 2018 -1 2 1,365 1,214 NLH Power Purchases:⁶ 95 MW Saturday, February 17, 2018 -1 -8 1,605 1,495 Sunday, February 18, 2018 Maritime Link Imports: -10 1,495 1,387 MW -5 -6 1,391 Other Island Generation: 215 MWMonday, February 19, 2018 1,500 Current St. John's Temperature & Windchill: -1 °C °C -7 1,317 -6 Tuesday, February 20, 2018 1,520 7-Day Island Peak Demand Forecast: 1,690 Wednesday, February 21, 2018 -13 1,690 1,579

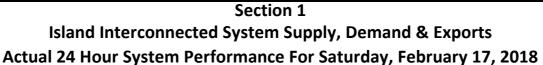
Supply Notes For February 15, 2018

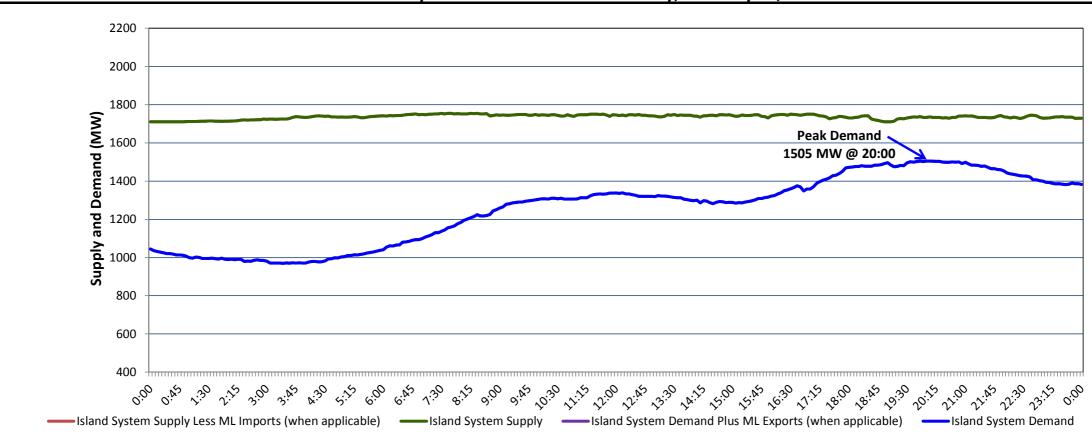
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- 5. Gross output from all Island sources (including Note 4).
- 6. NLH Power Purchases include: CBPP Co-Gen, Nalcor Exploits, Rattle Brook, Star Lake, Wind Generation, Vale capacity assistance (when applicable).
- 7. Adjusted for CBP&P, Vale and Praxair interruptible load, Maritime Link Exports and the impact of voltage reduction (when applicable).

Section 3 Island Peak Demand Information			
Previous Day Actual Peak and Current Day Forecast Peak			
Wed, Feb 14, 2018	Actual Island Peak Demand ^o	07:20	1,559 MW
Thu, Feb 15, 2018	Forecast Island Peak Demand		1,380 MW

Newfoundland Labrador Hydro (NLH) Supply and Demand Status Report Filed Monday, February 19, 2018





Supply Notes For February 17, 2018

1,2

- As of 2115 hours, January 04, 2018, Stephenville Gas Turbine available at 25 MW (50 MW).
- B As of 1204 hours, February 03, 2018, Holyrood Unit 1 unavailable 70 MW (170 MW).
 - At 0844 hours, February 17, 2018, Holyrood Unit 2 available at 110 MW (170 MW).
- At 0844 hours, February 17, 2018, Holyrood Unit 3 available at 105 MW (150 MW)

Section 2 Island Interconnected Supply and Demand Temperature **Island System Daily** Island System Outlook³ Sun, Feb 18, 2018 (°C) Peak Demand (MW) Seven-Day Forecast Forecast Adjusted Morning **Evening** Available Island System Supply:5 1,665 MW Sunday, February 18, 2018 -12 1,540 1,367 NLH Generation:4 1,355 MW Monday, February 19, 2018 -6 -5 1,550 1,327 NLH Power Purchases: Tuesday, February 20, 2018 -5 -1 1,455 100 MW 1,283 Wednesday, February 21, 2018 -5 -2 1,460 1,337 Maritime Link Imports: MW -7 Other Island Generation: Thursday, February 22, 2018 1,535 1,426 210 MW °C Friday, February 23, 2018 Current St. John's Temperature & Windchill: -13 °C -16 -10 -9 1,615 1,446 7-Day Island Peak Demand Forecast: 1,615 MW Saturday, February 24, 2018 -10 -5 1,510 1,337

Supply Notes For February 18, 2018

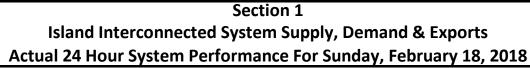
At 0656 hours, February 18, 2018, Granite Canal Unit unavailable (40 MW).

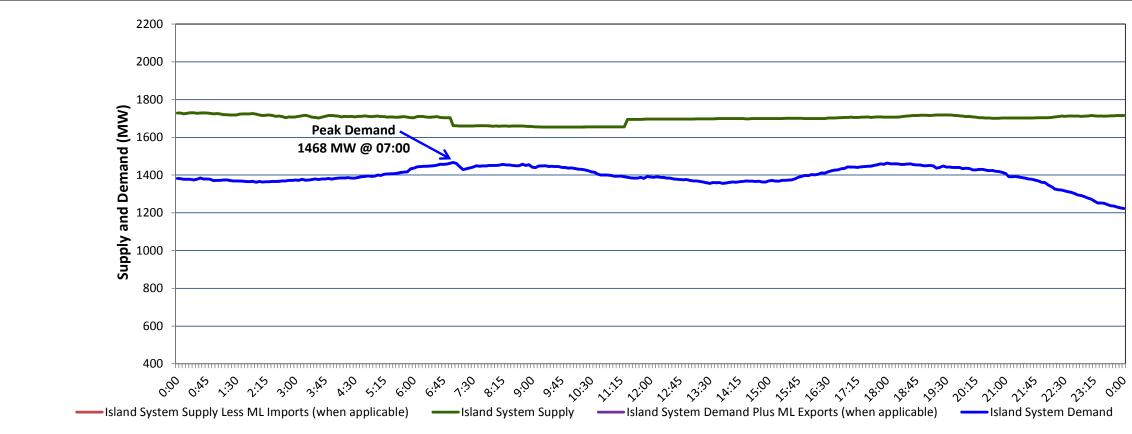
Notes:

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- 5. Gross output from all Island sources (including Note 4).
- 6. NLH Power Purchases include: CBPP Co-Gen, Nalcor Exploits, Rattle Brook, Star Lake, Wind Generation, Vale capacity assistance (when applicable).
- 7. Adjusted for CBP&P, Vale and Praxair interruptible load, Maritime Link Exports and the impact of voltage reduction (when applicable).

	Section 3			
Island Peak Demand Information				
Previous Day Actual Peak and Current Day Forecast Peak				
Sat, Feb 17, 2018	Actual Island Peak Demand ⁸	20:00	1,505 MW	
Sun, Feb 18, 2018	Forecast Island Peak Demand		1,540 MW	

Newfoundland Labrador Hydro (NLH) Supply and Demand Status Report Filed Monday, February 19, 2018





Supply Notes For February 18, 2018

1,2

- As of 2115 hours, January 04, 2018, Stephenville Gas Turbine available at 25 MW (50 MW).
- As of 1204 hours, February 03, 2018, Holyrood Unit 1 unavailable 70 MW (170 MW).
- C As of 0844 hours, February 17, 2018, Holyrood Unit 2 available at 110 MW (170 MW).
- As of 0844 hours, February 17, 2018, Holyrood Unit 3 available at 105 MW (150 MW).
- At 0656 hours, February 18, 2018, Granite Canal Unit unavailable (40 MW).
 - At 1123 hours, February 18, 2018, Granite Canal Unit available (40 MW).

Section 2 Island Interconnected Supply and Demand Temperature Island System Daily Peak Island System Outlook³ Mon, Feb 19, 2018 Seven-Day Forecast (°C) Demand (MW) Adjusted⁷ Morning **Evening Forecast** Available Island System Supply:5 1,715 Monday, February 19, 2018 1,495 1,327 MW -6 -6 NLH Generation:4 -3 -3 1,395 MW Tuesday, February 20, 2018 1,445 1,337 NLH Power Purchases:⁶ Wednesday, February 21, 2018 -7 1,515 1,372 110 MW -1 Maritime Link Imports: Thursday, February 22, 2018 1,590 1,480 -8 MW Other Island Generation: Friday, February 23, 2018 1,650 Current St. John's Temperature & Windchill: -7 -14 Saturday, February 24, 2018 1,400 1,293 -5 Sunday, February 25, 2018 7-Day Island Peak Demand Forecast: 1,650 MW 1,385 1,278

Supply Notes For February 19, 2018

Notes:

- 1. Generation outages for running and corrective maintenance are included. These are not unusual for power system operations. They generally do not impact customer supply. The power system operators schedule outages to system equipment whenever possible to coincide with periods when customer demands are low and sufficient supply reserves are available. However, from time to time equipment outages are necessary and reserves may be impacted.
- 2. Due to the Island System having no synchronous connections to the larger North American grid, when there is a sudden loss of large generating units some customer's load must be interrupted for short periods to bring generation output equal to customer demand. This automatic action of power system protection, referred to as under frequency load shedding, is necessary to ensure the integrity and reliability of system equipment. Under frequency events typically occur 5 to 8 times per year on the Island Interconnected System and the resultant customer load interruptions are generally less than 30 minutes.
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- 7. Adjusted for CBP&P, Vale and Praxair interruptible load, Maritime Link Exports and the impact of voltage reduction (when applicable).

Section 3 Island Peak Demand Information Previous Day Actual Peak and Current Day Forecast Peak			
Sun, Feb 18, 2018	Actual Island Peak Demand ⁸	07:00	1,468 MW
Mon, Feb 19, 2018	Forecast Island Peak Demand		1,495 MW

PUB-NLH-044, Attachment 3 Reliability and Resource Adequacy Study Page 1 of 2



Hydro Place. 500 Columbus Drive. P.O. Box 12400. St. John's. NL Canada A1B 4K7 t. 709.737.1400 f. 709.737.1800 www.nlh.nl.ca

April 10, 2019

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

Attention: Ms. Cheryl Blundon

Director of Corporate Services & Board Secretary

Dear Ms. Blundon:

Re: Newfoundland and Labrador Hydro's Capacity Assistance Agreements with Vale

Newfoundland and Labrador Limited

Background

Newfoundland and Labrador Hydro ("Hydro") presently has three capacity assistance agreements in place with industrial customers; one with Corner Brook Pulp and Paper Limited ("CBPP") and two with Vale Newfoundland and Labrador Limited ("Vale").

The Board of Commissioners of Public Utilities (the "Board") approved a 6 MW Load Curtailment Agreement with Vale in Board Order No. P.U. 44(2018). In that Order, Hydro was directed to file a report with the Board no later than April 15 of the year following each winter period. The report is to include the dates, times, duration, and system conditions under which capacity assistance was requested, provided, and capacity and variable payments made.

The Board approved the revised capacity assistance agreement with CBPP in Board Order No. P.U. 40(2018). The report detailing the use of that agreement is required by May 30, 2019.

Hydro also has an agreement with Vale for the provision of up to 8 MW of capacity assistance from Vale's diesel generating facilities. This agreement was provided to the Board on November 18, 2018 for information purposes.¹

In accordance with Board direction, this letter summarizes the details and costs associated with Hydro's use of the capacity assistance agreements for the four month winter period of December 1, 2018 to March 31, 2019.

Capacity Assistance Operating Experience Summary

During the winter of 2018–2019, Hydro did not make any requests to Vale to utilize the load curtailment under either the 6 MW Load Curtailment Agreement, or make a request for capacity assistance from their standby diesel generation. Therefore, there were no expenditures for curtailed energy at the Energy Curtailed Rate.² The total fixed fee (capacity) paid to Vale, as required under the agreements, is shown in Table 1.

¹ As this agreement is for supply of capacity and energy to Hydro and does not affect the Industrial Service Agreements approved by the Board, Hydro did not seek a Board Order with respect to this agreement. ² "Energy Curtailed Rate" means \$0.20 per kWh of energy curtailed.

Ms. Cheryl Blundon Public Utilities Board 2

Table 1: Fixed Fee Charges under Vale Agreements

Agreement	No. of Assistance Requests	Demand Capacity Fee \$/kW/yr. ³	Capacity (kW)	Paid Under The Agreement (\$)
Capacity Assistance	0	28	7,560	211,680
Load Curtailment	0	28	6,000	168,000
2018-2019 Total	0		13,560	379,680

Please contact the undersigned should you have any questions.

Yours truly,

NEWFOUNDLAND AND LABRADOR HYDRO

Shirley A. Walsh Senior Legal Counsel, Regulatory SAW/sk

cc: Gerard Hayes, Newfoundland Power Inc. Paul Coxworthy, Stewart McKelvey Denis Fleming, Cox & Palmer

ecc: Larry Bartlett, Teck Resources Ltd.

Dennis Browne, Q.C., Browne Fitzgerald Morgan & Avis Sheryl Nisenbaum, Praxair Canada Inc.

Dean A. Porter, Poole Althouse

 $^{^{3}}$ "Demand Curtailment Fee" calculated at \$7 per kW/month, for the agreement duration of four months.