

Requests for Information

1 PUB-CA-009 **On page 33, lines 9-15 Elenchus states: “The evidence to date indicates**
2 **to Elenchus that NP is excluding consideration in its 2022 CBA of**
3 **alternatives that merit at least preliminary inclusion in “a reasonable**
4 **range of alternative solutions.”**

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6 **Further on page 35, lines 17-22 Elenchus states: “Unless NP can**
7 **demonstrate through further disclosure and discovery that (i) it has**
8 **considered a reasonable range of alternatives and (ii) those alternatives**
9 **are not preferable to the proposed projects taking into account both**
10 **costs and uncertainty with respect to the long-term value of the**
11 **proposed projects, it follows that all relevant information has not been**
12 **identified and included as is necessary to identify the least cost option**
13 **and therefore prudent alternative.”**

14
15 (a) **Which specific projects in Newfoundland Power’s 2022 Capital**
16 **Budget is Elenchus referring to when stating that all relevant**
17 **information has not been identified?**

18 (b) **What specific additional information for each of these projects**
19 **is Elenchus recommending Newfoundland Power provide to**
20 **demonstrate that it has considered a reasonable range of**
21 **alternatives and that the alternatives are not preferable to the**
22 **proposed project?**

23
24 RESPONSE: (a) and (b) Elenchus is not in a position to identify all relevant alternatives
25 for the projects included in Newfoundland Power’s 2022 Capital Budget.
26 Rather, Elenchus has identified the types of alternatives that NP could have
27 identified. The point being made by Elenchus is that NP cannot meet the
28 PUB’s stated prudency review standards unless it can demonstrate that it
29 has considered, and where relevant rejected, with reasons, alternatives such
30 as those set out in the response to PUB-CA-008.

31
32 NP’s 2022 CBA does not include, as a standard practice, any discussion on
33 a project-by-project basis of the range of options considered to demonstrate
34 that it has met the prudence review standard. To demonstrate that it has
35 considered a reasonable range of alternatives and that the alternatives are
36 not preferable to the proposed project, Elenchus would expect NP to include
37 at least some discussion of its process for identifying alternatives and the
38 basis for rejecting the alternatives that have not been pursued, as well as
39 information concerning the alternatives considered.

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41 As a practical matter, it might be reasonable for the PUB to refine its
42 prudence review standard by establishing a threshold project cost below
43 which NP would not be required to include specific details of the
44 alternatives considered.