



July 20, 2015

Ms. G. Cheryl Blundon
Director of Corporate Services and Board Secretary
Board of Commissioners of Public Utilities
120 Torbay Road
P.O. Box 21040
St. John's, NL A1A 5B2

Dear Ms. Blundon:

Re: Newfoundland Power – 2016 Capital Budget Application

In relation to the above noted application please find enclosed the original and twelve copies of the Consumer Advocate's Requests for Information numbered CA-NP-01 to CA-NP-31.

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

TJ/cel

Encl.

cc: Newfoundland & Labrador Hydro
Attention: Geoffrey P. Young, Senior Legal Counsel

Newfoundland Power
Attention: Gerard Hayes, Senior Legal Counsel

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

IN THE MATTER OF capital
expenditures and rate base of
Newfoundland Power Inc.; and

IN THE MATTER OF an application by
Newfoundland Power Inc. for an order
pursuant to Sections 41 and 78 of the Act:

- (a) approving a 2016 Capital Budget
of \$107,028,000;
- (b) approving certain capital
expenditures related to multi-year
projects commencing in 2016; and
- (c) fixing and determining a 2014 rate
base of \$964,930,000

Requests for Information by The Consumer Advocate

CA-NP-01 to CA-NP-31

July 20, 2015

Re: Tab 5.1 – Vehicle Replacement Criteria

CA-NP-01 Referencing Appendix A, please identify which of the 12 utilities are
Atlantic, Central or Western respectively.

CA-NP-02 Please provide the age and kilometers for each vehicle Newfoundland
Power replaced for the years 2010 through 2014.

CA-NP-03 At page 2 Newfoundland Power states:

**Generally, vehicles are replaced at a lower age in Atlantic Canada than in
Western Canada. This likely reflects differences in utility operating
regions. Atlantic Canada is well known for the relatively high exposure to
salty environmental conditions which accelerate corrosion.**

1 Does Newfoundland Power have any vehicle manufacturer
2 recommendations or data to support the need to retire vehicles earlier in
3 Atlantic Canada than in Central or Western Canada?
4

5 CA-NP-04 In Chart 1 and Chart 2, does the Atlantic Region include Newfoundland
6 Power?
7

8 CA-NP-05 Please provide the data reviewed by Newfoundland Power between 2011
9 through 2014 as set out in footnote 2, at page 4.
10

11 CA-NP-06 Does Newfoundland Power invest in rust protection for any of its vehicles
12 either at the time of sale or after market? If so, what is Newfoundland
13 Power's policy pertaining to same and if not, why not?
14

15 CA-NP-07 What warranty protection does Newfoundland Power seek on the vehicles
16 by category that it purchases?
17

18 CA-NP-08 Please provide the questions sent by Newfoundland Power to each utility
19 and the data received from each without identifying the specific utility
20 other than identifying whether the utility is Atlantic, Central or Western.
21

22 CA-NP-09 At page 7 Newfoundland Power states:
23

24 **Chart 6 compares the Canadian utility survey results for the kilometers**
25 **driven at which vehicles are assessed or replaced for each class of vehicle**
26 **to Newfoundland Power's criterion.**
27

28 At page 9 Newfoundland Power states:
29

30 **Chart 8 compares the Atlantic Canadian regional utility survey results for**
31 **the kilometers driven at which vehicles are assessed or replaced for each**
32 **class of vehicle to Newfoundland Power's criterion.**
33

34 For each of the 12 utilities referred to in Appendix A, please indicate
35 whether what each has reported is the criterion at which point vehicles
36 are assessed or the criterion at which they are replaced.
37

1 **Re: Schedule B – 2016 Capital Projects (p. 11 of 98) Greenhill Gas Turbine Overhaul**

2
3 CA-NP-10 When does Newfoundland Power anticipate that the unit will be taken out
4 of service and put back into service?

5
6 **Re: Schedule B – 2016 Capital Projects (p. 28 of 98) Extensions**

7
8 CA-NP-11 Newfoundland Power outlines that the cost for connection for new
9 customers is calculated on the basis of historical data (page 29). This
10 can lead to some variances, as outlined in the 2015 Capital Expenditure
11 Status Report, Appendix A at page 3 of 5. Please provide a chart for the
12 period 2011 to 2014 outlining Newfoundland Power's estimate of the
13 number of new customers and the actual number of new customers
14 added.

15
16 CA-NP-12 How does Newfoundland Power arrive at its new connection estimates?

17
18 CA-NP-13 Does Newfoundland Power have an explanation as to why its estimate of
19 required new customer connections for 2015 was over as set out in the
20 2015 Capital Expenditure Status Report, Appendix A at page 3 of 5?

21
22 CA-NP-14 Is Newfoundland Power using the same methodology for calculating new
23 connections for 2016 as it did in 2015?

24
25 **Re: Schedule B – 2016 Capital Projects (p. 82 of 98) Personal Computer**
26 **Infrastructure**

27
28 CA-NP-15 Table 1 outlines Newfoundland Power is forecasting a decrease in the
29 number of desktops and increase the number of mobile computers. Is it
30 Newfoundland Power's intention to increase the use of mobile computers
31 (laptops) on a go-forward basis? If so, why is this the case and is there
32 an increased cost of converting from desktop to mobile computers?

1 CA-NP-16 What is the expected lifespan of a desktop versus a mobile computer?

2
3 CA-NP-17 What is the anticipated breakdown cost for each mobile computer?

4
5 CA-NP-18 What is the anticipated breakdown cost of each desktop?

6
7 **Re: 2016 Capital Plan (3.2.7 Transportation) p. 19 and 20**

8
9 CA-NP-19 Newfoundland Power outlines the following:

10
11 *Also, commencing in 2016 and continuing through 2020, the Company*
12 *plans to increase the heavy fleet from 71 units to 80 units to accommodate*
13 *the increase in the number of journey person power line technicians*
14 *resulting from the advancement of apprentices. This will reduce the*
15 *number of 3 person crews and increase the number of 2 person crews,*
16 *which, in turn, will approve efficiency.*
17

18 What is the industry practice when it comes to journey person power line
19 technicians in terms of the number of members in a crew?

20
21 CA-NP-20 Further to CA-NP-19, are three person or two person crews the standard
22 in the industry in the Maritimes? Canada?

23
24 CA-NP-21 Further to CA-NP-19, what is the basis for Newfoundland Power's
25 conclusion that reducing the crew members from three to two will improve
26 efficiency?

27
28 CA-NP-22 How are the Company's plans to increase the Heavy fleet from 71 to 80
29 units anticipated to impact the amount of capital and operating
30 expenditures for Newfoundland Power's fleet relative to the status quo
31 over the coming years?

32
33 CA-NP-23 Please provide a breakdown of Newfoundland Power's Heavy fleet
34 vehicles, passenger vehicles and off road vehicles for the years 2011 to
35 forecast 2020.
36

1 **Re: 2015 Distribution Reliability Review**

2

3 CA-NP-24 Chart 6 shows the SAIDI for Newfoundland Power vs the Canadian
4 average and Chart 7 shows the SAIFI for Newfoundland Power vs. the
5 Canadian average. What is Newfoundland Power's assessment as to
6 why it has performed better than average on SAIDI and consistent with
7 the average on SAIFI?

8

9 CA-NP-25 Does Newfoundland Power have SAIDI for other Canadian utilities in
10 extreme conditions as outlined in Chart 10? If so, please provide this
11 information.

12

13 CA-NP-26 Does Newfoundland Power have data as to the number and age of poles
14 that actually failed in each extreme weather event in 2014 outlined in
15 Table 4 and Chart 12? If so, please provide the same.

16

17 CA-NP-27 Table 3 shows Newfoundland Power's Distribution Poles by age. Does
18 Newfoundland Power have the data of distribution poles by age for other
19 Canadian utilities? If so, please provide the same.

20

21 CA-NP-28 Please provide a copy of the Master's Thesis referred to in footnote 17,
22 page 14.

23

24 CA-NP-29 Does Newfoundland Power have data from other Canadian utilities as to
25 the rate of pole replacement? If so, please provide the same.

26

27 CA-NP-30 In section 4.4, Reliability Outlook at page 19, Newfoundland Power states
28 that it intends to conduct a thorough assessment of the matter including
29 best North American utility practice to address its reliability outlook.
30 When does Newfoundland Power anticipate commencing and concluding
31 this assessment?

32

33

34

1 **Re: Tab 4.4 – 2016 Metering Strategy**

2

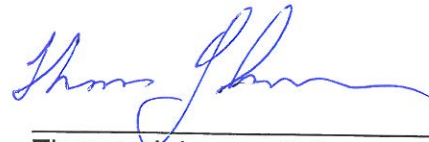
3 CA-NP-31 What are the salary and transportation savings attributed to AMR use

4 since 2010?

5

6 Dated at St. John's in the Province of Newfoundland and Labrador, this 2nd day of

7 July, 2015.



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