IN THE MATTER OF the Electrical Power Control Act, RSNL, 1994, Chapter E-5.1 (the "EPCA") and the Public Utilities Act, RSNL 1990, Chapter P-47 (the "Act"), as amended (the "Act") and regulations thereunder; and

IN THE MATTER OF Order No. P.U. 43 (2017) in relation to Hydro's 2018 Capital Budget Application and

AND IN THE MATTER OF the Network Additions Policy Review Dated October 1, 2018; the Labrador Interconnected System – Network Additions Policy dated December 14, 2018; the Labrador Interconnected System Transmission Expansion Study dated October 31, 2018; and Revision 1 dated November 5, 2018 filed by Newfoundland and Labrador Hydro

CONSUMER ADVOCATE REQUESTS FOR INFORMATION

CA-NLH-007 to CA-NLH-016

Issued: June 11, 2020

1 2 3 4 5 6 7 8	CA-NLH-007	In light of information gleaned from the Technical Conference held on May 28, 2020 on the Network Additions Policy, does Hydro propose any changes to its proposed Network Additions Policy? More specifically, in Hydro's response to PUB-NLH-085 it is stated that interruptible load is not considered a least cost alternative for supply to Labrador Interconnected Customers. Has Hydro changed its opinion on offering an interruptible rate to new customers on the Labrador Interconnected System?
9 10 11 12 13	CA-NLH-008	Have Labrador Interconnected customers indicated a willingness to pay rates that would be 8% greater as a result of the proposed Labrador transmission expansion plan? If so, please provide proof and the source of such proof.
14 15 16 17 18 19 20	CA-NLH-009	It is understood that: 1) Labrador Interconnected customers experience lower reliability of supply than Island Interconnected customers, and 2) Labrador Interconnected customers have much lower rates than Island Interconnected customers. Have Labrador Interconnected customers complained that the value of electric service received is not comparable to that on the Island? If so, please provide proof and the source of such proof.
21 22 23 24 25	CA-NLH-010	What will Labrador Interconnected customers receive in return for the 8% rate increase brought on by the proposed Labrador transmission expansion plan? For example, what benefits will customers see in terms of reliability, customer quality of service, provincial economic activity, etc.
26 27 28 29 30 31 32 33 34 35 36	CA-NLH-011	The response to NP-NLH-033 states "The impact of network additions to the Island is materially different than Labrador". The response to PUB-NLH-054 indicates that a revised Network Additions Policy for the Island is not as urgent as the need for a revised policy in Labrador. If Hydro's proposed Network Additions Policy is consistent with industry best practice, are impacts and urgency adequate justification for having different Network Additions Policies for the Island and Labrador Interconnected Systems? Would it not be a better use of the Board's time to develop a Province-wide Network Additions Policy since the objectives and principles of such policy would be the same?
37 38 39 40	CA-NLH-012	If the target loss of load probability for the system were 1 day in 10 years, how would Hydro determine the value of reliability improvements beyond this level, for example, 1 day in 20 years?
41 42	CA-NLH-013	Has Hydro ever charged a new customer in the Province for network additions? Please provide examples of any such cases.

1	CA-NLH-014	Please provide a table summarizing Hydro's proposed Network Additions
2		Policy including the rights these customers will be granted in exchange for
3		payment of network upgrades, how long the customers retain these rights
4		and the transmission rate these customers will pay. In the table, identify the
5		differences between Hydro's proposed policy and the policies proposed by
6		the consultants for the Board and the Labrador Interconnected Group.
7		
8	CA-NLH-015	In Hydro's opinion, should crypto-currency customers be treated as a
9		separate class of customers? What are the benefits of doing so? Is it legal to
10		treat crypto-currency customers differently than other customers under
11		current legislation?
12		
13	CA-NLH-016	Where does Hydro plan to publish its Network Additions Policy so that
14		potential new customers will have ready access to the information? Will it
15		be made part of the Open Access Transmission Tariff?

<u>DATED</u> at St. John's, Newfoundland and Labrador, this <u>11th</u> day of June, 2020.

Per: Dennis Browne, Q.C.

Consumer Advocate

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