

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-PUB-001 to CA-PUB-008

Issued: June 11, 2020

- 1 CA-PUB-001 In Brattle’s opinion, what are the objectives of a network additions policy
2 that should be used by the Board to assess the various proposals?
3
- 4 CA-PUB-002 Please explain FERC’s “higher of” policy which prohibits “and” pricing
5 and how this is applied in a competitive jurisdiction such as PJM with
6 transmission rights.
7
- 8 CA-PUB-003 It is understood that Brattle’s proposed Network Additions Policy is
9 consistent with industry best practice. Is there any reason why it should not
10 apply to the Island Interconnected System as well? Can Brattle provide any
11 reasons why there should be different Network Additions Policies for
12 Labrador and the Island?
13
- 14 CA-PUB-004 In Brattle’s experience, what is the typical time frame used for power
15 system planning in North America and Europe?
16
- 17 CA-PUB-005 In Brattle’s experience, are interruptible rates reflecting savings in
18 transmission expansion costs common in North America and Europe? Can
19 Brattle provide examples?
20
- 21 CA-PUB-006 In Brattle’s opinion, should cryptocurrency customers be treated as a
22 separate class of customers? What are the benefits of doing so?
23
- 24 CA-PUB-007 Can the risks associated with supply to cryptocurrency customers be
25 adequately managed through use of security deposits?
26
- 27 CA-PUB-008 Quantify the amount Brattle would recommend be placed in a security
28 deposit for cryptocurrency customers.

DATED at St. John’s, Newfoundland and Labrador, this 11th day of June, 2020.

Per:



Dennis Browne, Q.C.

Consumer Advocate

Terrace on the Square, Level 2, P.O. Box 23135
St. John’s, Newfoundland & Labrador A1B 4J9

Telephone: (709) 724-3800

Telecopier: (709) 754-3800