

May 7, 2014

VIA COURIER and ELECTRONIC MAIL

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

Attention: Ms. G. Cheryl Blundon
Board Secretary

Dear Ms. Blundon:

RE: General Rate Application of Newfoundland and Labrador Hydro

Enclosed are the original and twelve (12) copies of Vale's RFIs on expert evidence filed in respect of the above-noted Application.

We have provided a copy of this correspondence together with enclosures to all concerned parties.

We trust you will find the enclosed satisfactory.

Yours faithfully,


Thomas J. O'Reilly, Q.C.

TJOR/js
Encl.

c.c. Newfoundland & Labrador Hydro
P. O. Box 12400
500 Columbus Drive
St. John's, NL A1B 4K7
Attention: Geoffrey P. Young
Senior Legal Counsel

Thomas J. O'Reilly, Q.C. | Partner

Direct 709 570 5320 Main 709 738 7800 Fax 709 726 3070 Email toreilly@coxandpalmer.com
Suite 1000 Scotia Centre 235 Water Street St. John's NL A1C 1B6

May 14, 2014

Newfoundland Power
P. O. Box 8910
55 Kenmount Road
St. John's, NL A1B 3P6
Attention: Gerard Hayes, Senior Legal Counsel

Thomas J. Johnson, Consumer Advocate
O'Dea, Earle
323 Duckworth Street
P. O. Box 5955, Stn. C
St. John's, NL A1C 5X4

Corner Brook Pulp and Paper Limited,
North Atlantic Refining Limited
and Teck Resources Limited
Stewart McKelvey
PO Box 5038
11th Floor, Cabot Place
100 New Gower Street
St. John's, NL A1C 5V3
Attention: Paul Coxworthy

Miller & Hearn
450 Avalon Drive
P.O. Box 129
Labrador City, NL A2V 2K3
Attention: Edward M. Hearn, Q.C.

Olthuis, Leer, Townshend LLP
229 College Street
Suite 312
Toronto, ON M5T 1R4
Attention: Stephanie Kearns

House of Commons
Confederation Building
Room 682
Ottawa, ON K1A 0A6
Attention: Yvonne Jones, MP Labrador

IN THE MATTER OF the *Public Utilities Act*, R.S.N. 1990, Chapter P-47 (the “Act”): and

IN THE MATTER OF a General Rate Application (the Application) by Newfoundland and Labrador Hydro for approvals of, under Section 70 of the Act, changes in the rates to be charged for the supply of power and energy to Newfoundland Power, Rural Customers and Industrial Customers; and under Section 71 of the Act, changes in the Rules and Regulations applicable to the supply of electricity to Rural Customers.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19

REQUESTS FOR INFORMATION ON EXPERT EVIDENCE
VALE NEWFOUNDLAND & LABRADOR LIMITED

V-NP-001 and V-PUB-001 to V-PUB-002

Issued May 7, 2014

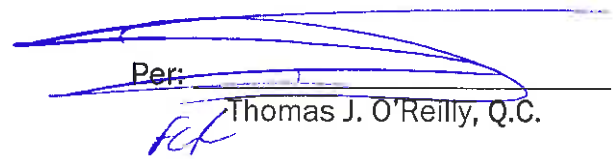
- V-NP-001** Reference: Section 4.3: NP Curtailable Load Recommendation, Pages 8 – 10
- Mr. Brockman proposes to recognize the NP curtailable load in the cost of service (COS) study in the same manner as the NP thermal generation. If Hydro and an industrial customer were to agree on interrupting a load of 60 mW, would Mr. Brockman also recommend recognizing the 60 mW in the same way in the COS study?
- V-PUB-001** Reference: Section II: Cost Allocation, Transmission Plant and Costs, Pages 10 – 12
- Mr. Wilson proposes changing the existing classification of network lines and substations. Has Mr. Wilson calculated the impact that his proposed changes would have on each customer class? If so, please supply the impact, complete with all calculations.
- V-PUB-002** Reference: Section IV: Other Issues Related to Cost Allocation and Rate Design, Conservation and Demand Management (CDM), Pages 31 – 34

1
2
3
4
5
6
7

Mr. Wilson proposes exempting NP from paying a portion of the CDM program because NP has their own CDM costs. At the time of construction, new industrial customers incorporate energy saving designs at their own cost, even though all customers benefit from the reduced fuel consumption at Holyrood resulting from these designs. In view of this, does Mr. Wilson likewise support industrial customers being exempt from paying their portion of the CDM costs?

DATED at St. John's, in the Province of Newfoundland and Labrador, this 7th day of May, 2014.

COX & PALMER


Per: _____
Thomas J. O'Reilly, Q.C.

TO: The Board of Commissioners of Public Utilities
Suite E210, Prince Charles Building
120 Torbay Road
P. O. Box 21040
St. John's, NL A1A 5B2
Attention: Board Secretary

TO: Newfoundland & Labrador Hydro
P. O. Box 12400
500 Columbus Drive
St. John's, NL A1B 4K7
Attention: Geoffrey P. Young
Senior Legal Counsel

TO: Newfoundland Power
P. O. Box 8910
55 Kenmount Road
St. John's, NL A1B 3P6
Attention: Gerard Hayes
Senior Legal Counsel

TO: Thomas J. Johnson, Consumer Advocate
O'Dea, Earle
323 Duckworth Street
P. O. Box 5955, Stn. C
St. John's, NL A1C 5X4

- TO: Corner Brook Pulp and Paper Limited,
North Atlantic Refining Limited
and Teck Resources Limited
Stewart McKelvey
PO Box 5038
11th Floor, Cabot Place
100 New Gower Street
St. John's, NL A1C 5V3
Attention: Paul Coxworthy
- TO: Miller & Hearn
450 Avalon Drive
P.O. Box 129
Labrador City, NL A2V 2K3
Attention: Edward M. Hearn, Q.C.
- TO: Olthuis, Leer, Townshend LLP
229 College Street
Suite 312
Toronto, ON M5T 1R4
Attention: Stephanie Kearns
- TO: House of Commons
Confederation Building
Room 682
Ottawa, ON K1A 0A6
Attention: Yvonne Jones, MP Labrador