

POOLE ALTHOUSE

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November 25, 2013

Via Electronic Mail & Courier

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

Attention: Ms. G. Cheryl Blundon
Director of Corporate Services and Board Secretary

Dear Madam:

**Re: Newfoundland and Labrador Hydro – Application, Received November 18, 2013,
For Approval of Customer Electricity Rates for 2014 On An Interim Basis, Or In
The Alternative, For a Deferral and Recovery Mechanism**

Please find enclosed one original and twelve (12) copies of the Requests for Information numbered IC-NLH-1 to IC-NLH-5 of the Island Industrial Customers in relation to the above noted Application.

A copy of the letter, together with enclosures, has been forwarded directly to the parties listed below.

We trust you find the foregoing satisfactory.

Yours very truly,

POOLE ALTHOUSE

Dean A. Porter

DAP/lp
Encls.

November 25th, 2013

Attn: Ms. G. Cheryl Blundon

J:\Clients\25754-49\NLBCPU, ltr #14.doc

cc: Mr. Geoffrey P. Young, Senior Legal Counsel, Newfoundland and Labrador Hydro
Mr. Thomas J. Johnson, Consumer Advocate
Mr. Gerard Hayes, Newfoundland Power
Mr. Paul Coxworthy, Stewart McKelvey
Mr. Thomas J. O'Reilly, Q.C., Vale Newfoundland and Labrador Limited
Mr. Ed Hearn, Q.C., Miller & Hearn
Ms. Nancy Kleer, Olthuis, Kleer, Townshend LLP
Ms. Yvonne Jones, MP, House of Commons

1 **IN THE MATTER** OF THE *ELECTRICAL POWER CONTROL*
2 *ACT*, SNL 1994, CHAPTER E-5.1 (THE "EPCA") AND THE
3 *PUBLIC UTILITIES ACT*, RSNL 1990, CHAPTER P-47
4 (THE "ACT"), AND REGULATIONS THEREUNDER;
5

6 **AND**
7

8 **IN THE MATTER OF** AN APPLICATION BY NEWFOUNDLAND
9 AND LABRADOR HYDRO, PURSUANT TO SECTIONS 70 AND
10 75 OF THE ACT, FOR THE APPROVAL OF CUSTOMER
11 ELECTRICITY RATES FOR 2014 ON AN INTERIM BASIS OR,
12 IN THE ALTERNATIVE, FOR A DEFERRAL AND RECOVERY
13 MECHANISM.
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20 **ISLAND INDUSTRIAL CUSTOMERS**
21 **REQUESTS FOR INFORMATION**
22 **IC-NLH-1 to IC-NLH-5**
23 **Issued November 25, 2013**
24
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2 IC-NLH-1 Please provide Hydro's experience with interim rates for each Hydro GRA since 2000,
3 including the date of the original GRA filing, the date of any request for interim rates, the
4 date of any Board Order approving and/or refusing to approve the interim rates, the
5 stage of the hearing that had concluded before Hydro requested and/or the PUB
6 approved interim rates (e.g., intervenor evidence filed, negotiations underway,
7 negotiations completed, hearing underway, etc.).
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9 IC-NLH-2 Preamble – in many jurisdictions, only a portion of an estimated GRA shortfall would be
10 included in any interim rates approved prior to a GRA hearing. For each previous
11 example of interim rates approved for Hydro before a negotiated settlement had been
12 concluded (if any), please indicate the proportion of the Hydro-calculated shortfall that
13 was included in the interim rates.
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15 IC-NLH-3 Please provide an estimate of the interim rates that would be imposed on each customer
16 class in the event that the Public Utilities Board ordered that only shortfalls related to fuel
17 price be included in interim rates as of January 1, 2014.
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19 IC-NLH-4 Please provide an estimate of the total Industrial Customer rates, and the degree of rate
20 increase to be experienced by the Industrial Customers (including both those customers
21 on the common rate and Teck) under the following three scenarios: (1) full approval of
22 Island Interconnected interim rates as at January 1, 2014; (2) no approval of interim
23 rates as at January 1, 2014; (3) partial approval of interim rates as at January 1, 2014,
24 only for GRA forecast fuel price changes.
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26 IC-NLH-5 Please indicate the percentage of the overall GRA shortfall that would be recovered
27 through interim rates if the January 1, 2014 rates included the portion of the GRA
28 shortfall related to fuel price.
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All of which is respectfully submitted on behalf of the Island Industrial Customers.

DATED at the City of Corner Brook, in the Province of Newfoundland and Labrador, this 25th day of November, 2013.

Poole Althouse / Stewart McKelvey

Solicitors for the Island Industrial Customers

Per: _____

Dean A. Porter

Per: _____

Paul L. Coxworthy

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

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

TO: Vale Newfoundland and Labrador Limited
c/o Cox & Palmer
Suite 1000, Scotia Centre
235 Water Street
St. John's, NL A1C 1B6
Attention: Thomas J. O'Reilly, Q.C.

TO: Corner Brook Pulp & Paper Limited
c/o Stewart McKelvey
Cabot Place, 100 New Gower Street
P.O. Box 5038
St. John's, NL A1C 5V3
Attention: Paul Coxworthy

TO: Miller & Hearn
PO Box 129
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Labrador City, NL A2V 2K3
Attention: Ed Hearn, Q.C.

TO: Olthuis, Kleer, Townshend LLP
229 College Street
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M5T 1R4
Attention: Nancy Kleer

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