

June 2, 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: Second Interim General Rate Application of Newfoundland and Labrador Hydro

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Enclosed are the original and twelve (12) copies of Vale's RFIs 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. Geoffrey P. Young, Senior Legal Counsel, Newfoundland & Labrador Hydro  
Gerard Hayes, Senior Legal Counsel Newfoundland Power  
Consumer Advocate, Thomas J. Johnson, O'Dea, Earle  
Paul Coxworthy, Stewart McKelvey  
Edward M. Hearn, Q.C., Miller & Hearn  
Stephanie Kearns, Olthuis, Leer, Townshend LLP  
Yvonne Jones, MP Labrador, House of Commons

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

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Suite 1000 Scotia Centre 235 Water Street St. John's NL A1C 1B6

IN THE MATTER OF the *Electrical Power Control Act, 1994*, R.S.N.L. 1994, Chapter E-5.1 (the EPCA) and the *Public Utilities Act*, R.S.N.L. 1990, Chapter P-47 (the Act) and regulations thereunder;

AND IN THE MATTER OF a second application by Newfoundland and Labrador Hydro, pursuant to Sections 70 and 75 of the Act, for the interim approval of customer electricity rates for 2014 pursuant to Order No. P.U. 13(2014) (the "Application").

1 REQUESTS FOR INFORMATION OF VALE NEWFOUNDLAND & LABRADOR LIMITED

2 SIR-V-NLH-001 to SIR-V-NLH-013

3 Issued June 2, 2014

4 SIR-V-NLH-001 Reference: Second Interim Rates Application Evidence, section  
5 3.3.2 Hydraulic Component, page 7, lines 2 to 3

6 Please provide a copy of the December 2013 Rate Stabilization  
7 Plan Report.

8 SIR-V-NLH-002 Reference: Second Interim Rates Application Evidence, section  
9 2.2 2014 Update, pages 3 – 4

10 Please confirm that this section is provided for information only  
11 and that Hydro is not seeking any interim additional cost recovery  
12 for forecast 2014 costs above those previously applied for in the  
13 2013 GRA.

14 SIR-V-NLH-003 References: Application, section 15;  
15 Evidence, Section 3.4 Recovery Proposal, page 7, lines 17 and  
16 19  
17 Evidence, Section 5.0 Summary, page 11, line 21

18 In each of the above four references, the term “actual shortfall  
19 for 2014” is used. Please explain exactly what is meant by this  
20 term. In particular, does the “actual shortfall for 2014” include  
21 costs that were not anticipated in 2013 GRA application?

1    SIR-V-NLH-004    Reference: Application, section 10

2                        If the Board approves the \$29.4 million transfer from the  
3                        Hydraulic Production Component of the RSP, what impact (in  
4                        \$/kWh) will this have on each customer class in 2015?

5    SIR-V-NLH-005    Reference: Application, section 10

6                        If the Board approves the \$29.4 million transfer from the  
7                        Hydraulic Production Component of the RSP, please confirm that  
8                        the split between customer classes will be done strictly on the  
9                        basis of energy.

10   SIR-V-NLH-006    Reference: Evidence, Appendix A

11                        Please confirm that the difference in expenses as shown in  
12                        appendix A is a combination of demand and energy related costs.

13   SIR-V-NLH-007    Reference: Evidence, section 3.3.2 Hydraulic Component, page  
14                        7, lines 4 - 6

15                        Is the accumulation of \$68.8 million in the hydraulic component  
16                        of the RSP strictly due to above average precipitation? If not,  
17                        what are the other contributing factors?

18   SIR-V-NLH-008    Reference: Evidence, section 3.1 Option 1 – Recovery Upon  
19                        Approval of Final Rates, page 5, line 13

20                        Please list the “other stakeholders” referred to in line 13.

21   SIR-V-NLH-009    Reference: Evidence, section 4.3 Interim Phase-in Proposal,  
22                        page 9, lines 13 – 16

23                        Please explain the rationale for choosing 0.745 \$/kWh as the  
24                        credit reduction. If this was the result of a calculation, please  
25                        include all worksheets.

26   SIR-V-NLH-010    Reference: Evidence, Appendix A, page A1, line 2

27                        Please provide all the supporting calculations and data for the  
28                        \$601,418,000 and the \$502,238,000 amounts plus the  
29                        difference for each category.

1 SIR-V-NLH-011 Reference: Evidence, Appendix A, page A1, line 11

2 Please provide all the supporting calculations and data for the  
3 (\$9,534,000) and the (\$81,593,000) amounts.

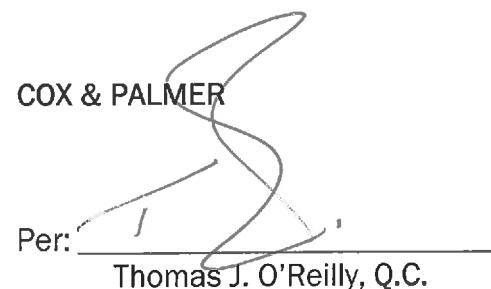
4 SIR-V-NLH-012 Reference: Evidence, Appendix A, page A1, line 16

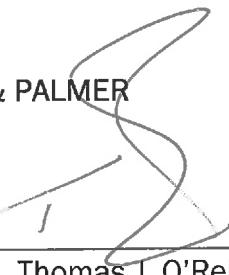
5 Please provide all the supporting calculations and data for the  
6 \$865,000 and the \$843,000 amounts.

7 SIR-V-NLH-013 Reference: Evidence, section 4.3 Interim Phase-in Proposal,  
8 pages 8 – 9

9 Using the rates proposed in the second interim application,  
10 please update Table 3 from the July 30, 2013 Industrial Rate  
11 Stabilization Plan application.

DATED at St. John's, in the Province of Newfoundland and Labrador, this 2<sup>nd</sup> day  
of June, 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