

NEWFOUNDLAND AND LABRADOR BOARD OF COMMISSIONERS OF PUBLIC UTILITIES 120 Torbay Road, P.O. Box 21040, St. John's, Newfoundland and Labrador, Canada, A1A 5B2

2015-05-19

Mr. Geoff Young Newfoundland and Labrador Hydro P. O. Box 12400 Hydro Place, Columbus Drive St. John's, NL A1B 4K7

Dear Sir:

Re: Newfoundland and Labrador Hydro – Amended General Rate Application – Prudence Review – Requests for Information – Revision 2

Further to our May 11, 2015 and May 12, 2015 correspondence please find attached a replacement page of the Information Requests PR-PUB-NLH-086 to PR-PUB-NLH-171 (page 2) regarding the above-noted application.

Revisions have been made to the following Information Request:

• PR-PUB-NLH-091

If you have any questions, please do not hesitate to contact the Board's Legal Counsel, Ms. Jacqui Glynn, by email, jglynn@pub.nl.ca or by telephone 709-726-6781.

Yours truly,

Cheryl Blundon Board Secretary

/cpj Encl

LIGA.		,
ecc.	Newfoundland & Labrador Hydro Mr. Fred Cass, E-mail: fcass@airdberlis.com <u>Consumer Advocate</u> Mr. Thomas Johnson, E-mail: tjohnson@odeaearle.ca Ms. Colleen Lacey, E-mail: clacey@odeacarle.ca Mr. Raman Balakrishnan, E-mail: rbalakrishnan@odeaearl.ca <u>Yale Newfoundland and Labrador Limited</u> Mr. Thomas O'Reilly, QC, E-mail: toreilly@coxandpalmer.com Mr. Donis Fleming, E-mail: toreilly@coxandpalmer.com <u>Innu Nation</u> Ms. Nancy Kleer, E-mail: nkleer@oktlaw.com Mr. Senwung Luk, E-mail: sluk@oktlaw.com <u>Nunatsiavut Government</u> Ms. Genevieve Dawson, E-mail: gdawson@bensonbuffett.com	Newfoundland Power Inc. Mr. Gerard Hayes, E-mail: ghayes@newfoundlandpower.com Mr. Liam O'Brien, B-mail: lobrien@curtisdawe.nf.ca Island Industrial Customer Group Mr. Paul Coxworthy, E-mail: pcoxworthy@stewartmckelvey.com Mr. Dean Portor, E-mail: dporter@pa-law.ca Towns of Labrador City, Wabush, Happy Valley-Goose Bay and North West River Mr. Dennis Browne, Email: dbrowne@bfina-law.com Mr. Edward Heam, QC, E-mail: miller&heam@orrstv.net Ms. Melanie Dawe, B-mail: miller&heam@orrstv.net Ms. Melanie Dawe, B-mail: miller&heam@orrstv.net Ms. Yvonne Jones, MP, Labrador, Ms. Yvonne Jones, MP, Labrador, B-mail: Yvonne Lones, Al @pard ec.cs. Yvonne Jones C1@part ac.cs
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Cheryl Blundon, Director of Corporate Services and Board Secretary, Tel: 709-726-8600, E-Mail: cblundon@pub.nl.ca Website: www.pub.nl.ca

1 2 3 4 5 6	PR-PUB-NLH-086	Please provide paper copies and electronic copies of the "Overtime Summary" of 2013 and 2014, including a breakdown by home based unit division, operating and capital dollars, gross pay and hours, permanent employee and temporary employee information, and variances between 2013 and 2014. Also provide the same broken down by monthly totals.
7 8 9 10 11 12	PR-PUB-NLH-087	Please confirm that in the "Overtime Summary" for 2013 and 2014, referenced in PR-PUB-NLH-086, the amounts provided tie to and accurately reflect information contained in the 2014 Hydro regulated financial statements, and that the amounts reflect a full, accurate and complete listing of such overtime information.
12 13 14 15 16 17	PR-PUB-NLH-088	Further to PR-PUB-NLH-086, please confirm that the information provided in the "Overtime Summary" for 2013 and 2014 is identical to that provided to Liberty over the course of the review of the January 2014 outages. If this is not the case, please identify and explain any differences.
18 19 20 21	PR-PUB-NLH-089	Please provide electronic versions of 2011 and 2012 (both annual and monthly) versions of the data described in PR-PUB-NLH-086, using a similar format.
22 23 24 25	PR-PUB-NLH-090	Please provide a copy of the Integrated Action Plan used in the discussions between Hydro and Liberty with respect to the activities and costs associated with the January 2014 outages.
23 26 27 28 29 30	PR-PUB-NLH-091 ((Rev 1) Further to PR-PUB-NLH-090, please provide Hydro's calculations and breakdown by cost category of the components for the expenditures associated with Hydro's Integrated Action Plan items 18, 19, 29, 33, 34 and 49, as previously discussed with Liberty.
30 31 32 33 34 35	PR-PUB-NLH-092	Further to the response to V-NLH-088 in the general rate case, regarding Hydro's treatment of the incremental costs related to the power outages in 2014, please provide 2014 actual information in the same format using actual, audited information.
36 37 38 39 40	PR-PUB-NLH-093	Please provide a summary of the outage costs listed in the response to V- HLH-088 in the general rate case, incurred and recorded as regulated costs in 2014, showing a breakdown by Hydro Generation, Thermal Generation, Transmission and Rural Operations, and support departments.
41 42 43	PR-PUB-NLH-094	Please provide a detailed breakdown of the "consulting costs" and intercompany salary transfers to Hydro included in the response to PR-PUB-NLH-092.
44 45 46	PR-PUB-NLH-095	Please confirm that the intercompany salary transfers included in the response to PR-PUB-NLH-092 and PR-PUB-NLH-094 do not include

1 **IN THE MATTER OF** the *Electrical Power*

- 2 Control Act, 1994, SNL 1994, Chapter E-5.1 (the
- 3 "EPCA") and the Public Utilities Act, RSNL 1990,
- 4 Chapter P-47 (the "*Act*"), as amended, and regulations
- 5 thereunder; and
- 6
- 7 **IN THE MATTER OF** a general rate application
- 8 filed by Newfoundland and Labrador Hydro on
- 9 July 30, 2013; and
- 10
- 11 IN THE MATTER OF an amended general rate
- 12 application filed by Newfoundland and Labrador
- 13 Hydro on November 10, 2014; and
- 14
- 15 **IN THE MATTER OF** a prudence review relating to
- 16 certain actions and costs of Newfoundland and Labrador
- 17 Hydro.

PUBLIC UTILITIES BOARD REQUESTS FOR INFORMATION

PR-PUB-NLH-086 to PR-PUB-NLH-171

Issued: May 11, 2015

1 2 3 4 5 6	PR-PUB-NLH-086	Please provide paper copies and electronic copies of the "Overtime Summary" of 2013 and 2014, including a breakdown by home based unit division, operating and capital dollars, gross pay and hours, permanent employee and temporary employee information, and variances between 2013 and 2014. Also provide the same broken down by monthly totals.
7 8 9 10 11 12	PR-PUB-NLH-087	Please confirm that in the "Overtime Summary" for 2013 and 2014, referenced in PR-PUB-NLH-086, the amounts provided tie to and accurately reflect information contained in the 2014 Hydro regulated financial statements, and that the amounts reflect a full, accurate and complete listing of such overtime information.
12 13 14 15 16 17	PR-PUB-NLH-088	Further to PR-PUB-NLH-086, please confirm that the information provided in the "Overtime Summary" for 2013 and 2014 is identical to that provided to Liberty over the course of the review of the January 2014 outages. If this is not the case, please identify and explain any differences.
18 19 20 21	PR-PUB-NLH-089	Please provide electronic versions of 2011 and 2012 (both annual and monthly) versions of the data described in PR-PUB-NLH-086, using a similar format.
22 23 24 25	PR-PUB-NLH-090	Please provide a copy of the Integrated Action Plan used in the discussions between Hydro and Liberty with respect to the activities and costs associated with the January 2014 outages.
23 26 27 28 29 30	PR-PUB-NLH-091 ((Rev 1) Further to PR-PUB-NLH-090, please provide Hydro's calculations and breakdown by cost category of the components for the expenditures associated with Hydro's Integrated Action Plan items 18, 19, 29, 33, 34 and 49, as previously discussed with Liberty.
30 31 32 33 34 35	PR-PUB-NLH-092	Further to the response to V-NLH-088 in the general rate case, regarding Hydro's treatment of the incremental costs related to the power outages in 2014, please provide 2014 actual information in the same format using actual, audited information.
36 37 38 39 40	PR-PUB-NLH-093	Please provide a summary of the outage costs listed in the response to V- HLH-088 in the general rate case, incurred and recorded as regulated costs in 2014, showing a breakdown by Hydro Generation, Thermal Generation, Transmission and Rural Operations, and support departments.
41 42 43	PR-PUB-NLH-094	Please provide a detailed breakdown of the "consulting costs" and intercompany salary transfers to Hydro included in the response to PR-PUB-NLH-092.
44 45 46	PR-PUB-NLH-095	Please confirm that the intercompany salary transfers included in the response to PR-PUB-NLH-092 and PR-PUB-NLH-094 do not include

1 engineering compensation costs for Project Engineering and Technical 2 Support personnel who performed 2014 outage-related work for Hydro. 3 4 PR-PUB-NLH-096 Please provide the 2015 compensation costs for non-Hydro home based 5 Project Engineering and Technician Support personnel who worked on the 6 outages and did or should have charged time to Hydro. 7 PR-PUB-NLH-097 8 Please provide the forecast included in the current rate case for insurance 9 proceeds associated with the Sunnyside Transformer Replacement and 10 provide the same information with 2014 actual, audited capital 11 expenditures, operating expenses (including depreciation) and insurance 12 proceeds. 13 14 **PR-PUB-NLH-098** Please provide a breakdown of the 2014 actual operating costs and 15 consulting costs that were included in the summary of the Sunnyside 16 Transformer Replacement Project referred to in the response to PR-PUB-17 NLH-097. 18 PR-PUB-NLH-099 19 Please confirm that Liberty requested that Hydro provide the total amounts 20paid for professional services in 2014, and access to the supporting 21 invoices and work papers to review at Hydro's offices and that Hydro

Regulated Hydro Professional Services		
Consultants	\$7,146,098	
Audit	\$112,992	
Legal	\$654	
PUB Related Costs	\$3,814,860	
Software	\$1,554,549	
Total Regulated Hydro	\$12,629,153	

provided the summary shown in the table below.

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- PR-PUB-NLH-100
 Further to PR-PUB-NLH-099 please confirm that the amounts shown in the table tie to and accurately reflect information contained in Hydro's 2014 regulated financial statements, and that the amounts reflect a full, accurate, and complete listing of professional services costs.
- PR-PUB-NLH-101 Please provide copies of the 12-page and 4-page summaries of Hydro's
 2014 Professional Services which were reviewed by Liberty at Hydro's office.
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- 32 PR-PUB-NLH-102
 33 Further to PR-PUB-NLH-101 please confirm that the amounts used tie to and accurately reflect information contained in Hydro's 2014 regulated financial statements, and that the amounts reflect a full, accurate, and complete listing of 2014 consultant costs exceeding \$10,000.

1 2 3 4	PR-PUB-NLH-103	Please provide the date when the 8x2 MW diesel black start capability was in service and the date when it no longer was necessary due to completion of the new CT.
5 6 7	PR-PUB-NLH-104	Please identify all occasions on which any of the 8x2 MW diesel units were unavailable during the period prior to new CT availability.
8 9 10 11	PR-PUB-NLH-105	Please identify all occasions on which black start was unavailable at any time after the 8x2 MW diesel units first became available and prior to new CT availability and explain the reasons for such unavailability.
112 13 14 15 16 17 18 19 20	PR-PUB-NLH-106	Please refer to the response to PUB-NLH-013, Attachment 3, filed in Hydro's Holyrood Blackstart Diesel Units Application, which starts with, "Here is note from Terry Ledrew and John MacIsaac's response. This is not surprising but nevertheless a concern for the Avalon and Holyrood's security. If we lose transmission supply to Holyrood we will not be able to get the plant started to begin restoration." The remaining material in the attachment does not address this security concern. Please clarify and explain the concern.
21 22 23 24 25 26 27 28	PR-PUB-NLH-107	The response to NP-NLH-018 in Hydro's Holyrood Blackstart Application (the Blackstart Application) states that all 8 of the 2 MW temporary black start diesels must be running to support the startup of a boiler feed pump. In its December 2011 report filed as attachment 1 to NP-NLH-022 in the Blackstart Application, AMEC stated 5 X 2 MW diesels was a viable option. Please explain this apparent discrepancy, and describe whether, in retrospect, all the AMEC recommended options were inadequate.
29 30 31 32	PR-PUB-NLH-108	Please provide the estimated reliability, in terms of failure to start or other appropriate measure, of each of the 8 diesel generators that form part of the black start system.
33 34 35 36	PR-PUB-NLH-109	Please provide the estimated reliability, using the same measures as in the response to PR-PUB-NLH-108, of the black start system as a whole during use of the 8 diesel generators.
37 38 39 40 41 42 43 44	PR-PUB-NLH-110	The response to NP-NLH-018 in Hydro's Holyrood Blackstart Application suggests that required black start capability will be lost upon the failure of one of the diesels and that contingency plans with resulting delays will be required for such an event. Please explain Hydro's basis for selecting an option that will not meet the design intent if even one of eight components fails and describe whether one or more additional units was considered for backup.
44 45 46	PR-PUB-NLH-111	The response to PUB-NLH-029 in Hydro's Holyrood Blackstart Application (the "Application") states that the Newfoundland Power

1 2 3 4 5 6 7 8 9		mobile unit was moved to Holyrood to bolster capacity on the Avalon Peninsula, implying that its use to provide black start capability was an after-thought. The report filed with the Application, at Page 4, states that, "In recognition of this delay in restart caused by the lack of local blackstart generation, Hydro immediately requested Newfoundland Power to station two of its mobile generators at the Holyrood site." Please clarify the timing and rationale for using the mobile unit for black start capability and explain that answer in the context of the preface to this RFI.	
10 11 12 13 14	PR-PUB-NLH-112	Explain why the Newfoundland Power mobile unit was considered for black start capability and how it meets black start needs, given that its capacity (7.5 MW) was well below any of the previously proposed solutions.	
15 16 17 18 19	PR-PUB-NLH-113 (Rev 1)	Please provide the Holyrood black start actual, audited 2014 capital and operating costs for 2014. Please provide the Hardwoods black start accounting records, descriptions and all related work papers.
20 21 22 23 24	PR-PUB-NLH-114 (Rev 1)	Please provide the Holyrood black start capital and operating cost estimates included in the 2015 test period in the current rate case, and all revisions to that data to date, and provide all related descriptions and work papers for 2015 and any revisions.
25 26 27 28 29	PR-PUB-NLH-115	Newfou unit in	provide the capital and operating costs of moving the indland Power mobile unit from the West Coast and operating the 2014, and the Newfoundland Power mobile unit moving and ons accounting records, descriptions and all related work papers.
30 31 32 33 34	PR-PUB-NLH-116	cost est any), a	provide the Newfoundland Power mobile unit capital and operating imates included in the 2015 test period in the current rate case (if and all revisions to that data to date, including all related tions and work papers for 2015 and any revisions.
35 36 37 38	PR-PUB-NLH-117	Please provide any industry data compiled by Hydro that verifies that the cost of the new CT is reasonable when compared with the \$/kw cost of similar plants.	
39 40 41 42 43	PR-PUB-NLH-118	\$/kw_b	ars that the final cost of the new CT is about half the cost (on a asis) of the originally planned 60 MW unit; please explain this it discrepancy, explaining all reasons for the lower cost/kw of the CT.
44 45 46	PR-PUB-NLH-119	new C7	describe whether and how industry data supports the cost of the f and provide the basis for the cost estimate for the 60 MW CT nsidered by Hydro.

1 2 3 4 5 6 7 8 9	PR-PUB-NLH-120	The Generation Planning Issues Report of 2012 (Appendix C of Hydro's Application for Approval of the Project to Supply and Install 100 MW Combustion Turbine) states on Page 15 that, "It should be noted that the capacity deficits trigger the need for the next generation source by late 2014 under the current planning criteria to avoid exceeding the LOLH limits in 2015." Yet it appears that the new CT had always been planned for late 2015, not late 2014. Please explain the basis for this decision and the rationale for not planning a late 2014 installation.
10 11 12	PR-PUB-NLH-121	Please provide the new CT capital and operating costs in actual, audited accounting data, descriptions and all related work papers for 2014.
13 14 15 16 17	PR-PUB-NLH-122	Please provide the new CT capital and operating expense estimates included for the 2015 test period in the current rate case, all revisions to that data to date, and all related descriptions and work papers for 2015 and any revisions.
18 19 20 21 22	PR-PUB-NLH-123	The response to PR-PUB-NLH-010 states that Unit 1 at the Holyrood Plant meets ISO-7919-2 guidelines for unrestricted, long-term operation. Please provide the 2014 vibration measurements that are within Zone B of the guideline that justify unrestricted, long-term operations.
23 24 25	PR-PUB-NLH-124	Further to PR-PUB-NLH-123, please provide and describe the vibration measurements for Unit 1 at the Holyrod Plant observed during 2013.
26 27 28 29 30	PR-PUB-NLH-125	Please confirm that a structural engineer considered the effects of Holyrood Unit 1 2013 vibrations transmitted to the structure or foundation. If yes, provide a copy of that engineer's report and if no, explain why not.
31 32 33 34 35 36	PR-PUB-NLH-126	Does Hydro consider that a design of the emergency diesel generator scheme in which the unit does not start under degraded voltage conditions (brownout), but only on complete loss of power (blackout), is "standard industry practice"? If yes, provide all the documentation on which Hydro relies for this position.
37 38 39 40 41 42	PR-PUB-NLH-127	In Hydro's root cause analysis of the 2013 Unit 1 lube oil failure filed as part of Hydro's 2013 supplemental capital budget application for the project, an incorrectly set resistor (Page 9) and a vendor QA/QC oversight failure (Page 10) were identified as root causes. Please explain the role these two factors contributed in the system failure and the degree to which they were or were not major contributors.
43 44 45	PR-PUB-NLH-128	Please identify the operating costs for replacement power during the 2013 outage of Unit 1 at the Holyrood Plant following the lube oil failure event.

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1 2 3 4	PR-PUB-NLH-129	Please provide all 2014 capital and operating costs associated with the 2013 Holyrood Unit 1 outage, including all replacement power, using actual, audited accounting data and including all related work papers.
5 6 7 8 9	PR-PUB-NLH-130	Please provide any 2013 Holyrood Unit 1 outage capital and operating costs included in the 2015 test period in the current rate case, all revisions to that data to date, and all related descriptions and work papers for 2015 and any revisions.
10 11 12	PR-PUB-NLH-131	Please provide all Holyrood Unit 1 2013 outage costs passed to customers through fuel clauses or other rate mechanisms in 2013 and 2014.
13 14 15 16 17 18 19	PR-PUB-NLH-132	 For each day in 2014 for which Hydro is requesting added supply-related costs, please provide the following information: Generating units / MW unavailable Temperature variable Peak load Source, MWh, and cost of replacement power.
20 21 22 23	PR-PUB-NLH-133	Further to PR-PUB-NLH-132, please provide those specifically attributable to the de-rate of Holyrood Unit 3 due to the failed FD fan motor.
24 25 26 27 28	PR-PUB-NLH-134	Please provide Hydro's analysis of the degree to which the added supply costs of 2014 should be considered atypical, specifically addressing the number and nature of unit outages versus other years and weather conditions and explain their impact on load.
29 30 31 32 33 34	PR-PUB-NLH-135	Please confirm that Hydro's reliability criterion of 2.8 LOLH has been used for many years, provide an estimate of the duration of that period, and confirm that the forced outage rates used in Strategist have been modified from time-to-time as Hydro believed such modifications were appropriate.
35 36 37 38 39 40 41 42 43	PR-PUB-NLH-136	 Please provide, dating back to at least 1998: The changes in forced outage rates used in the Strategist model as a function of time The reasons why such changes were thought to be appropriate The equivalent reserve requirement corresponding to the 2.8 LOLH for each new set of forced outage rates employed Any associated notifications to the Public Utilities Board regarding such changes or the impacts on reserves.
43 44 45 46	PR-PUB-NLH-137	Please provide all 2014 costs associated with agreements with Corner Brook Pulp and Paper to provide capacity, using actual, audited accounting data, and providing descriptions and all related work papers.

1 2 3 4	PR-PUB-NLH-138	Please provide any 2015 estimated costs included in the current rate case associated with agreements with Corner Brook Pulp and Paper to provide capacity, including all related descriptions and work papers.
5 6 7 8 9	PR-PUB-NLH-139	Please provide all 2014 costs associated with Hydro using additional diesel and gas turbine generation, plus incurred costs for requesting Newfoundland Power to run its thermal generation, using actual, audited accounting data, and providing descriptions and all related work papers.
10 11 12 13 14	PR-PUB-NLH-140	Please provide any 2015 estimated costs included in the current rate case associated with Hydro using additional diesel and gas turbine generation, plus incurred costs for requesting Newfoundland Power to run its thermal generation, providing all related descriptions and work papers.
15 16 17 18 19	PR-PUB-NLH-141	Please provide the records identifying all incremental 2014 and 2015 costs to date and included in the costs addressed in PR-PUB-NLH-137 through PR-PUB-NLH-140 that have been recovered from customers through fuel clauses or other rate adjustment mechanisms.
20 21 22 23	PR-PUB-NLH-142	Please confirm that an AMEC 2011 condition assessment of the Holyrood Plant concluded that the FD fan motor had a limited remaining life and was not likely to survive until the retirement of the Holyrood Plant.
24 25 26 27	PR-PUB-NLH-143	Please describe why Hydro made no efforts to replace FD fan motors at the Holyrood Plant and confirm a "run to failure" approach was followed by Hydro.
28 29 30 31	PR-PUB-NLH-144	Please confirm that in preparation for the winter of 2014-15, "spare" FD Fan motors were procured for the Holyrood Plant and that no plan existed to replace the FD fan motors.
32 33 34 35	PR-PUB-NLH-145	Please explain why Hydro did not believe the procurement of new FD fan motors was appropriate after the AMEC conclusions in 2011 and why a "run to failure" strategy was deemed appropriate.
36 37 38 39	PR-PUB-NLH-146	Please state each occasion after the AMEC 2011 condition assessment of the Holyrood Plant when new FD fan motors were included in a proposed annual budget. In the reference identify the motors, the year of the budget, the budgeted amount and the eventual disposition of the budget item.
40 41 42 43	PR-PUB-NLH-147	Please provide all 2014 capital and operating costs associated with the failure of the Holyrood Unit 3 FD Fan Motor, using actual, audited accounting data, and providing descriptions and all related work papers.

1 PR-PUB-NLH-148 Please provide any 2015 estimated costs included in the current rate case 2 associated with the failure of the Holyrood Unit 3 FD Fan Motor and 3 provide all related descriptions and work papers. 4 5 PR-PUB-NLH-149 A lack of confidence in temporary mobile generation at Black Tickle 6 seems to have been a basis for expediting the permanent solution for the 7 diesel plant. Please provide the basis for Hydro's lack of confidence. 8 9 PR-PUB-NLH-150 Please provide Hydro's actual experience with mobile diesel generating 10 units in isolated rural areas compared with other sources of supply in 11 diesel areas. 12 13 PR-PUB-NLH-151 A reduction in capacity of the Black Tickle diesel plant would likely have 14 produced a cost savings and a delay in returning the plant to its normal 15 service. Please provide Hydro's estimates of both the cost savings and the 16 schedule penalty of such capacity reduction. 17 18 PR-PUB-NLH-152 Please provide the Sunnyside Replacement Equipment actual, audited 19 accounting data, descriptions, and all related work papers for 2014, 20 addressing capital expenditures, per account/subaccount number 21 indicating labor and materials separately, operating costs, depreciation and 22 rate base. 23 24 PR-PUB-NLH-153 Please provide and explain the impacts of insurance proceeds, insurance 25 deductibles, and any other adjustments of 2014 actual capital 26 expenditures, operating costs, income statement, and rate base associated 27 with Sunnyside Replacement Equipment. 28 29 PR-PUB-NLH-154 Please provide the Sunnyside Replacement Equipment estimates per 30 account/subaccount number indicating labor and materials separately, 31 included in the 2015 test period in the current rate case (and all revisions 32 to date), including descriptions and work papers, and addressing capital 33 expenditures, operating costs, depreciation, and rate base. 34 35 PR-PUB-NLH-155 Please provide and explain the impacts of insurance proceeds, insurance 36 deductibles, and any other adjustments on 2015 test period Sunnyside 37 Replacement Equipment capital expenditures, operating costs, income 38 statement, and rate base. 39 40 PR-PUB-NLH-156 Further to the response to PR-PUB-NLH-035, please provide the Western 41 Avalon Tap Changer Replacement actual audited accounting data, 42 expenses per account/subaccount number, indicating labor and materials 43 separately, descriptions, and all related work papers for 2014, addressing 44 capital expenditures, operating costs, depreciation, and rate base.

- 1**PR-PUB-NLH-157**Please provide and explain the impacts of insurance proceeds, insurance22deductibles and any other adjustments on Western Avalon Tap Changer33Replacement 2014 actual capital expenditures, operating costs, income45
- 6 PR-PUB-NLH-158 Please provide the West Avalon Tap Changer Replacement estimates
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 Please provide the West Avalon Tap Changer Replacement estimates included in the 2015 test period in the current rate case (and all revisions to date), including descriptions and work papers, and addressing capital expenditures per account/subaccount number indicating labor and materials separately, operating costs, depreciation and rate base.
- PR-PUB-NLH-159
 Please provide and explain the impacts of insurance proceeds, insurance deductibles and any other adjustments on West Avalon Tap Changer Replacement 2015 test period capital expenditures, operating costs, income statement, and rate base.
- PR-PUB-NLH-160 Further to the response to PR-PUB-NLH-037, please provide the Sunnyside and Holyrood breaker overhauls actual, audited accounting data, per account/subaccount number, indicating labor and materials separately, descriptions, and all related work papers for 2014, addressing capital expenditures, operating costs, depreciation, and rate base.
- PR-PUB-NLH-161 Please provide and explain the impacts of insurance proceeds, insurance deductibles and any other adjustments on Sunnyside and Holyrood breaker overhauls 2014 actual capital expenditures, operating costs, income statement, and rate base.
- PR-PUB-NLH-162 Please provide the estimates per account/subaccount number indicating labor and materials separately, for Sunnyside and Holyrood breaker overhauls included in the 2015 test period in the current rate case (and revisions to date), including all related descriptions and work papers, and addressing capital expenditures, operating costs, depreciation, and rate base.
- 35 PR-PUB-NLH-163
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 Please provide and explain the impacts of insurance proceeds, insurance deductibles and any other adjustments on Sunnyside and Holyrood breaker overhauls 2015 test period capital expenditures, operating costs, income statement, and rate base.

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1 2 3 4 5 6	PR-PUB-NLH-165	Please provide the Labrador City project's actuals or estimates per account/subaccount number indicating labor and materials separately, included in the 2015 test period in the current rate case (and all revisions to date), including all related descriptions and work papers, and addressing capital expenditures, operating costs, depreciation, and rate base.
7 8 9 10 11 12	PR-PUB-NLH-166	With respect to work under the six-year maintenance cycle that was about three months overdue when the Sunnyside T1 transformer failed, please provide any documentation (existing before the January 2014 incidents) stating and describing when Hydro scheduled the deferred work performance.
12 13 14 15 16	PR-PUB-NLH-167	Please provide by voltage, the numbers of air blast circuit breakers overdue for 6-year maintenance at the end of each year 2007 through 2013.
17 18 19	PR-PUB-NLH-168	Please provide a list for each air blast circuit breaker of the dates on which Hydro completed the two most recent 6-year maintenance activities.
20 21 22	PR-PUB-NLH-169	Please provide the numbers of terminal station transformers overdue for 6- year maintenance at the end of each year 2007 through 2013.
23 24 25	PR-PUB-NLH-170	Please provide for each terminal station the dates on which Hydro completed the two most recent 6-year maintenance activities.
26 27 28	PR-PUB-NLH-171	Further to the response to PR-PUB-NLH-074, page 2, please confirm that the 2 to 8 year breaker maintenance frequency provided by Canadian utilities was for ABCBs and not for all types of breakers.

DATED at St. John's, Newfoundland this 11th day of May 2015.

BOARD OF COMMISSIONERS OF PUBLIC UTILITIES

Per Charlon Gheryl Blundon Board Secretary