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New Brunswick | Newfoundland and Labrador | Nova Scotia | Prince Edward Island

August 21, 2015

VIA COURIER and ELECTRONIC MAIL

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

Dear Ms. Blundon:

## RE: 2013 Amended General Rate Application of Newfoundland and Labrador Hydro – Prudence Review – Requests for Information

Enclosed are the original and twelve (12) copies of Vale's Requests for Information in respect of the above-noted Application.

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

We trust your will find the enclosed satisfactory.

Yours faithfully,

Thomas J. Ö'Reilly, Q.C.

TJOR/js Encl.

c.c. Geoffrey P. Young, Newfoundland & Labrador Hydro Gerard Hayes, Newfoundland Power Thomas J. Johnson, O'Dea, Earle Paul Coxworthy, Stewart McKelvey Dennis Browne, Q.C., Browne Fitzgerald Morgan & Avis Nancy Kleer, Olthuis, Leer, Townshend LLP Yvonne Jones, MP Labrador Genevieve M. Dawson, Benson Buffett Fred Winsor, Sierra Club Canada Roberta Frampton Benefiel, Grand Riverkeeper® Labrador Inc. Danny Dumaresque

## Thomas J. O'Rellly, Q.C. | Partner

Direct 709 570 5320 Main 709 738 7800 Fax 709 726 3070 Email Lorelly@coxandpalmer.com Suite 1000 Scotia Centre 235 Water Street St. John's NL A1C 1B6 **IN THE MATTER OF** the *Electrical Power Control Act, 1994,* 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"), as amended and regulations thereunder; and

**IN THE MATTER OF** a General Rate Application filed by Newfoundland and Labrador Hydro on July 30, 2013; and

**IN THE MATTER OF** an amended general rate application filed by Newfoundland and Labrador Hydro on November 10, 2014; and

**IN THE MATTER OF** a prudence review relating to certain actions and costs of Newfoundland and Labrador Hydro.

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T	REQUESTS FOR INFORMATION OF VALE NEWFOUNDLAND & LADRADOR LINITED		
2		PR-V-NLH-001 to PR-V-NLH-002	
3		Issued August 21, 2015	
4 5	PR-V-NLH-001	Reference: Prudence Review – Hydro's Response to Liberty's Report - Most Critical Work -page 10, lines 13-22	
6 7 8 9 10		The referenced lines explain that Hydro deferred preventive maintenance on air blast circuit breakers and power transformers in 2013 in order to perform the "most critical work". Please list those jobs and projects that Hydro classified as "most critical work".	
11 12	PR-V-NLH-002	Reference: Prudence Review – Hydro's Response to Liberty's Report - Most Critical Work -page 10, lines 13-22	
13 14 15		Please explain how Hydro managed to catch-up on breaker and transformer maintenance in 2014 and compare the quantity of "most critical work" performed between 2013 and 2014.	

DECUESTS FOR INFORMATION OF VALE NEWFOUNDLAND & LARRADOR LIMITED

- 1**PR-V-NLH-003**Reference: Prudence Review Hydro's Response to Liberty's2Report Circuit Breaker Performance in Cold Weather page 13,3lines 16-18
- Please point out where Liberty Consulting has stated that
  sustained cold weather can have an impact on circuit breaker
  performance.
- 7 PR-V-NLH-004 Reference: Prudence Review Hydro's Response to Liberty's
   8 Report Circuit Breaker Performance in Cold Weather page 13,
   9 lines 16-18
- 10Please supply the manufacturers' specifications for the operating11temperature for Breaker B1L03 and comment on the use of this12breaker in other Canadian jurisdictions, particularly those that13experience colder weather than in Newfoundland.

DATED at St. John's, in the Province of Newfoundland and La	abrador, this $\mathcal{A}$ /	day
of August, 2015.	1	

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: Stewart McKelvey PO Box 5038 11th Floor, Cabot Place 100 New Gower Street St. John's, NL A1C 5V3 Attention: Paul Coxworthy
- TO: Browne Fitzgerald Morgan & Avis Terrace on the Square P.O. Box 23135 St. John's, NL A1B 4J9 Attention: Dennis Browne, Q.C.
- TO: Olthuis, Leer, Townshend LLP 229 College Street Suite 312 Toronto, ON M5T 1R4 Attention: Nancy Kleer
- TO: House of Commons Confederation Building Room 682 Ottawa, ON K1A 0A6 Attention: Yvonne Jones, MP Labrador
- TO: Genevieve M. Dawson Benson Buffett PLC 9<sup>th</sup> Floor, Atlantic Place 215 Water Street P.O. Box 1538 St. John's, NL A1C 5N8
- TO: Sierra Club Canada Mr. Fred Winsor Conservation Chair Atlantic Canada Chapter St. John's, NL A1E 1N9

- TO: Ms. Roberta Frampton Benefiel Vice-President Grand Riverkeeper® Labrador Inc. Box 569, Station B Happy Valley-Goose Bay, NL AOP 1E0
- TO: Mr. Danny Dumaresque 213 Portugal Cove Road St. John's, NL A1B 2N5