

**DANNY DUMARESQUE**  
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2014-07-22

Ms. Cheryl Blundon  
Newfoundland and Labrador  
Board of Commissioners of Public Utilities  
120 Torbay Road  
St. John's, NL A1A 5B2

Dear Ms. Blundon:

**RE: An Application by Newfoundland Power Inc., pursuant to Sections 41 and 78 of the ACT – Requests for Information**

Please find enclosed the original and twelve (12) copies of the Requests for Information DD-NP-01 to DD-NP-19 regarding the above-noted matter. Paper copies will follow.

If you have any questions, please do not hesitate to contact me, via email  
[danny.liberal@gmail.com](mailto:danny.liberal@gmail.com) or (709) 685-5719.

Sincerely yours,

Danny Dumaresque  
Intervenor

Encl.

cc.

**NEWFOUNDLAND AND LABRADOR HYDRO**

Mr. Geoffrey P. Young, E-Mail: [gyoung@nlh.nl.ca](mailto:gyoung@nlh.nl.ca)

**NEWFOUNDLAND POWER INC.**

Mr. Gerard Hayes, E-Mail: [ghayes@newfoundlandpower.com](mailto:ghayes@newfoundlandpower.com)

Ian Kelly, QC, E-Mail: [ikelly@curtisdawe.com](mailto:ikelly@curtisdawe.com)

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Mr. Tom O'Reilly, E-Mail: [toreilly@coxandpalmer.com](mailto:toreilly@coxandpalmer.com)

1 **IN THE MATTER OF**

2 the *Public Utilities Act*, RSNL 1990, Chapter P-47 (the *ACT*)  
3 as amended; and

4  
5 **IN THE MATTER OF** Capital Expenditures  
6 And Rate Base of Newfoundland Power Inc.; and

7  
8 **IN THE MATTER OF** an Application by Newfoundland Power Inc.  
9 for an Order pursuant to Sections 41 and 78 of the Act:

- 10  
11 (a) Approving a 2015 Capital Budget of \$94,211,000;  
12 (b) Approving certain capital expenditures relating to  
13 Multi-year projects commencing in 2015; and  
14 (c) Fixing and determining a 2013 rate base of \$915,820,000.

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**DANNY DUMARESQUE**  
**REQUESTS FOR INFORMATION**

**DD-NP-001 to DD-NP-019**

**Issued: July 22, 2014**

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1	<b>DD-NP-001</b>	On page 10 of 2015 Capital Plan 3.2.2 Generation you indicate that
2		“generation capital expenditures will average approximately \$9.9 million
3		per year from 2015 through 2019” or \$50 million. As you know, Hydro
4		will have installed an additional 113 MW of generation by the end of this
5		year so please explain why the ratepayers of this Island should spend an
6		additional \$50 million on your generation.
7		
8	<b>DD-NP-002</b>	Further on the same page you indicate a plan “to purchase a 5 MW mobile
9		generator at an estimated cost of \$9.0 million. Why should the ratepayers
10		of the Island pay for this generation when Hydro is supplying all the
11		power you need on demand.
12		
13	<b>DD-NP-003</b>	Please provide the latest information (projections) on the cost of overhauling
14		the Company’s gas turbines.
15		
16	<b>DD-NP-004</b>	Page 14 2015 Capital Plan you indicate that “the number of new
17		customers connections is forecast to decrease ...by 7.3% “ (2015-2019)
18		Please provide the basis for this projection and a regional breakdown of
19		this 7.3% on the Island.
20		
21	<b>DD-NP-005</b>	Please provide the current number of customers served and the projected
22		number for the next 10 years.
23		
24	<b>DD-NP-006</b>	Please provide a list of the positions and the compensation paid to the
25		senior executive of Newfoundland Power, separating salary from bonuses,
26		for the past 5 years.
27		
28	<b>DD-NP-007</b>	Please provide a list of all subsea cables owned by Newfoundland Power
29		and a breakdown of each replacement since original commissioning of
30		each.
31		
32	<b>DD-NP-008</b>	The upgrading of Duffy Place will cost \$2,792,000. Please explain why
33		the ratepayers should have to pay for this facility.
34		
35	<b>DD-NP-009</b>	Page 7 6.1 2015 Application Enhancements NP 2015 CBA you indicate
36		that ‘3,900 high bill inquiries were received’. Please provide a breakdown
37		of these calls by region of the Island such as Avalon, Central and Western.
38		
39	<b>DD-NP-010</b>	Please confirm the number of bills which were changed as a result of the
40		calls received as per DD-NP-009 and why they were changed.
41		
42	<b>DD-NP-011</b>	Please provide a breakdown of high bill inquiry calls for the past 5 years
43		and the 2014 total to date.
44		

- 1 **DD-NP-012** Do you agree that MF power, lower cost or not to replacement of  
 2 Holyrood power, will be reality in 2018 and indeed there will be a surplus  
 3 of hydroelectricity on the Island for decades to come.  
 4
- 5 **DD-NP-013** On Page 2 of 97 in your Application you state “Maintaining these  
 6 generating facilities reduces the need for additional, more expensive,  
 7 generation.” Please identify what additional generation will be required  
 8 after the commissioning of the 100 MW CT generator this year and the  
 9 MF Infeed in 2018.  
 10
- 11 **DD-NP-014** On the same Page “All expenditures .... are required on the basis of  
 12 maintaining access to hydroelectric generation that is lower than the cost  
 13 of replacement energy.” Please identify what replacement energy you are  
 14 referring to in this statement.  
 15
- 16 **DD-NP-015** Do you agree that there will not be any annual fuel savings from operating  
 17 these generating units post MF power in 2018.  
 18
- 19 **DD-NP-016** Page 8 of 97 in the Application “A present worth feasibility analysis of  
 20 projected capital and operating expenditures for the Tors Cove Plant has  
 21 determined the levelized cost of energy from the plant over the next 50  
 22 years to be 2.77 cents/ Kwh.” What is the cost per kwh over 4 years, after  
 23 MF Infeed and please provide a copy of this feasibility analysis.  
 24
- 25 **DD-NP-017** Please provide a breakdown of Hydro requested usage of each of the 23  
 26 hydroelectric units over the past 5 years.  
 27
- 28 **DD-NP-018** What is the cost per Kwh over 4 years for Pierre’s Brook Plant  
 29 Refurbishment Project.  
 30
- 31 **DD-NP-019** What is the cost per Kwh over 4 years for the Seal Cove Refurbishment  
 32 Project.  
 33  
 34

**DATED** at St. John’s, Newfoundland this 22<sup>th</sup> day of July, 2014.

Per \_\_\_\_\_

**Danny Dumaresque,  
Intervenor**