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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 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

NEWFOUNDLAND POWER INC.

Mr. Gerard Hayes, E-Mail: ghayes@newfoundlandpower.com

Ian Kelly, QC, E-Mail: ikelly@curtisdawe.com

CONSUMER ADVOCATE

Mr. Thomas Johnson, E-Mail: tjohnson@odeaearle.ca

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ISLAND INDUSTRIAL CUSTOMER GROUP

Mr. Paul Coxworthy, E-Mail: pcoxworthy@stewartmckelvey.com

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PUBLIC UTILITIES BOARD

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Mr. Fred Winsor, E-Mail: winsorf@nl.rogers.com

Mr. Tom O'Reilly, E-Mail: toreilly@coxandpalmer.com

1 **IN THE MATTER OF**

2 the *Public Utilities Act*, RSNL 1990, Chapter P-47 (the *ACT*)

3 as amended; and

5 **IN THE MATTER OF** Capital Expenditures

6 And Rate Base of Newfoundland Power Inc.; and

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

DANNY DUMARESQUE
REQUESTS FOR INFORMATION

DD-NP-001 to DD-NP-019

Issued: July 22, 2014

1 DD-NP-001

2
3 On page 10 of 2015 Capital Plan 3.2.2 Generation you indicate that
4 “generation capital expenditures will average approximately \$9.9 million
5 per year from 2015 through 2019” or \$50 million. As you know, Hydro
6 will have installed an additional 113 MW of generation by the end of this
7 year so please explain why the ratepayers of this Island should spend an
8 additional \$50 million on your generation.

9 DD-NP-002

10 Further on the same page you indicate a plan “to purchase a 5 MW mobile
11 generator at an estimated cost of \$9.0 million. Why should the ratepayers
12 of the Island pay for this generation when Hydro is supplying all the
13 power you need on demand.

14 DD-NP-003

15 Please provide the latest information (projections) on the cost of overhauling
16 the Company’s gas turbines.

17 DD-NP-004

18 Page 14 2015 Capital Plan you indicate that “the number of new
19 customers connections is forecast to decrease ...by 7.3% “ (2015-2019)
20 Please provide the basis for this projection and a regional breakdown of
21 this 7.3% on the Island.

22 DD-NP-005

23 Please provide the current number of customers served and the projected
24 number for the next 10 years.

25 DD-NP-006

26 Please provide a list of the positions and the compensation paid to the
27 senior executive of Newfoundland Power, separating salary from bonuses,
28 for the past 5 years.

29 DD-NP-007

30 Please provide a list of all subsea cables owned by Newfoundland Power
31 and a breakdown of each replacement since original commissioning of
32 each.

33 DD-NP-008

34 The upgrading of Duffy Place will cost \$2,792,000. Please explain why
35 the ratepayers should have to pay for this facility.

36 DD-NP-009

37 Page 7 6.1 2015 Application Enhancements NP 2015 CBA you indicate
38 that ‘3,900 high bill inquiries were received’. Please provide a breakdown
39 of these calls by region of the Island such as Avalon, Central and Western.

40 DD-NP-010

41 Please confirm the number of bills which were changed as a result of the
42 calls received as per DD-NP-009 and why they were changed.

43 DD-NP-011

44 Please provide a breakdown of high bill inquiry calls for the past 5 years
45 and the 2014 total to date.

- 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 22th day of July, 2014.

Per _____

**Danny Dumaresque,
Intervenor**