



**HOUSE OF ASSEMBLY
NEWFOUNDLAND AND LABRADOR**

Leader of the Official Opposition

January 8, 2014

**Mr. Andy Wells
Chair and CEO
Board of Commissioners of Public Utilities
120 Torbay Rd
PO Box 21040
St. John's, NL
A1A 5B2
awells@pub.nl.ca**

Dear Mr. Wells,

Please find enclosed an official complaint to the Public Utilities Board from the members of the Official Opposition Caucus regarding the operations of Newfoundland and Labrador Hydro.

I look forward to your response.

Sincerely,

Dwight Ball, MHA
Leader of the Official Opposition



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A complaint to the Public Utilities Board (PUB) under section 84 of the Public Utilities Act (the “Act”) for the failure of Newfoundland and Labrador Hydro (NLH) to provide adequate and reliable and reasonable service as envisioned under section 37 of the Act and in particular as follows:

1. That the services provided by NLH are inadequate, unreliable and unreasonable as has been demonstrated by the recent power outages and rolling blackouts in the Province and in particular as follows:
 - a) Residents of the Island of Newfoundland were informed on January 2, 2014 that energy demand could exceed generation capacity that evening. Newfoundland Power subsequently initiated rolling blackouts across the province during a time of extreme cold temperatures.
 - b) NLH was unable to meet energy demands placed on the Interconnected Island System at least a day before the winter storm of January 3, 2014 and January 4, 2014.
 - c) A fire at the Sunnyside Station on January 4, 2014 caused power outages throughout the province, affecting upwards of 190,000 customers of Newfoundland Power.
 - d) A fault at the Holyrood Thermal Generating Station on January 5, 2014 caused power outages throughout the province.
 - e) Generation units at Stephenville, Hardwoods and Holyrood were all unavailable ahead of the cold snap and winter storm.
 - f) NLH failed to meet energy demands even before the winter storm on January 3, 2014 and January 4, 2014.
 - g) NLH did not have adequate planning to meet demand following the fire at the Sunnyside Station on January 4, 2014.
2. The Complainants repeat the foregoing and state that NLH failed to provide adequate and reliable and reasonable system planning and maintenance to ensure adequate and reliable and reasonable service pursuant to their statutory duty.
3. **AND IN THE RESULT** the Complainants request that the Public Utilities Board (PUB) hold a public hearing as soon as possible and take all evidence in reference to these matters and make such **Orders** following the hearing to ensure that all issues pertaining to this inadequate, unreliable and unreasonable service and to the maintenance and planning for the provision of adequate and reliable and reasonable service are addressed.



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DATED at the City of St. John's in the Province of Newfoundland and Labrador this 8th day of January, 2014.



Dwight Ball, M.H.A.



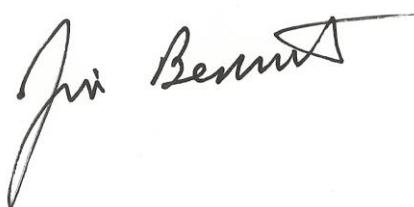
Andrew Parsons, M.H.A.



Tom Osborne, M.H.A.



Eddie Joyce, M.H.A.



Jim Bennett, M.H.A.



Randy Edmunds, M.H.A.



Lisa Dempster, M.H.A.



Sam Slade, M.H.A.