



December 4, 2014

Ms. G. Cheryl Blundon
Board of Commissioners of Public Utilities
120 Torbay Road, P.O. Box 12040
St. John's, NL A1A 5B2

Ladies & Gentlemen:

Re: The Board's Investigation and Hearing into Supply Issues and Power Outages on the Island Interconnected System – Requests for Information

In relation to the above noted matter please find enclosed one (1) original and twelve (12) copies of the Consumer Advocate's Requests for Information numbered CA-NLH-81 to CA-NLH-83.

We trust the enclosed are found to be in order.

If you have any questions please feel free to contact the undersigned.

Yours very truly,

O'DEA, EARLE

A handwritten signature in black ink, appearing to read 'Thomas Johnson', is written over the typed name.

THOMAS JOHNSON, Q.C.

TJ/cel

Encl.

cc: Newfoundland and Labrador Hydro
Attention: Geoffrey P. Young

Newfoundland Power
Attention: Gerard Hayes

Island Industrial Customers Group
Attention: Mr. Paul Coxworthy (Stewart McKelvey)

Mr. Danny Dumaresque

Grand Riverkeeper Labrador Inc.
Attention: Ms. Roberta Frampton

IN THE MATTER OF

the *Electrical Power Control Act*, 1994,
SNL 1994, Chapter E-5.1 (the "*EPCA*")
and the *Public Utilities Act*, RSNL 1990,
Chapter P-47 (the "*Act*"), as amended;

AND

IN THE MATTER OF

the Board's Investigation and Hearing
into Supply Issues and Power Outages
on the Island Interconnected System.

**CONSUMER ADVOCATE
REQUESTS FOR INFORMATION
CA-NLH-81 to CA-NLH-83
Issued: December 4, 2014**

1 CA-NLH-81 Please provide a detailed quantitative and qualitative analysis of
2 the reliability of supply on 1) Hydro’s Interconnected System, and
3 2) the Avalon Peninsula, comparing the situation in 2013 (pre-
4 Muskrat Falls) to the situation in 2020 (post Muskrat Falls with
5 Holyrood TGS retired). Specifically, will the reliability of supply
6 be improved following commissioning of the Muskrat Falls and
7 associated transmission project, and if so, by how much?
8

9 CA-NLH-82 Please provide a detailed quantitative and qualitative analysis of
10 the reliability of supply on 1) Hydro’s Interconnected System, and
11 2) the Avalon Peninsula, comparing the situation in 2022, post
12 Muskrat Falls with Holyrood TGS retired, to the situation in 2022,
13 post Muskrat Falls with Holyrood TGS in service and available for
14 base load operation if needed. Specifically, will the reliability of
15 supply be improved following commissioning of Muskrat Falls if
16 Holyrood remains operational, and if so, by how much?
17

18 CA-NLH-83 (Re: CA-NLH-28) Hydro indicates that generation capacity will be
19 available from neighboring jurisdictions to make full use of the
20 available transmission capacity. Is there not an expectation that
21 neighboring jurisdictions might coincidentally experience capacity
22 shortfalls during emergency conditions in NL? What is practice
23 elsewhere in this regard; i.e., in their planning studies, what
24 generation capacity, relative to available transmission import
25 capacity, do interconnected jurisdictions such as Ontario, British
26 Columbia, Nova Scotia and New Brunswick assume will be
27 available during emergency situations?
28

Dated at St. John's, in the Province of Newfoundland and Labrador, this 4th day of December, 2014.



Thomas Johnson, Q.C.
Consumer Advocate
323 Duckworth Street
St. John's, NL A1C 5X4
Telephone: (709) 726-3524
Facsimile: (709) 726-9600
Email: tjohnson@odeaearle.ca