

January 12, 2015

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

Dear Ms. Blundon:

**Re: Phase I – Outage Inquiry**

**Re: Request for Information from the Consumer Advocate to Board (Liberty), Newfoundland and Labrador Hydro and Newfoundland Power Inc.**

In relation to the above-captioned, the Consumer Advocate provides one (1) original and twelve (12) copies of the following Requests for Information for filing:

CA-PUB-01 to CA-PUB-33;  
CA-NLH-84 to CA-NLH-85; and  
CA-NP-25 to CA-NP-33.

The Requests for Information to Newfoundland Power include questions posed at the request of a commercial customer of Newfoundland Power Inc.

Yours very truly,

O'DEA, EARLE 

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.

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**CONSUMER ADVOCATE  
REQUESTS FOR INFORMATION  
CA-NLH-84 to CA-NLH-85  
Issued: January 12, 2015**

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CA-NLH-84

(Liberty December 17, 2014 Report to Board on *Supply Issues and Power Outages Review Island Interconnected System* addressing Newfoundland and Labrador Hydro) It is stated (page 4): “*Hydro correctly seeks to make its generation available by December 1 of each year. The goal is to complete required maintenance and repairs by the time that each winter season begins*”. Have there been occasions in the Province when the system annual peak was established during the month of November? Is there a case to be made for moving winter readiness forward from December 1 to November 1, or perhaps, November 15? Why should Hydro not be aiming for an earlier winter readiness date than December 1?

CA-NLH-85

(Liberty December 17, 2014 Report to Board on *Supply Issues and Power Outages Review Island Interconnected System* addressing Newfoundland and Labrador Hydro) Recommendation 2.13 states (Appendix A, page A-3) that given the vulnerabilities likely to be present on December 1, 2014, Hydro must prepare an emergency contingency plan to identify all generation resources for a potential supply emergency while the new CT remains unavailable. Hydro’s *Supply and Demand Status Report* filed with the Board on Friday, January 9, 2015 indicates that the new CT is not yet in service, and 25 MW of the Stephenville Gas Turbine remains unavailable (since December 15, 2014). Has Hydro filed an emergency contingency plan with the Board, and what generation resources has Hydro identified that are not already accounted for in the *Demand and Supply Status Report*?

Dated at St. John’s in the Province of Newfoundland and Labrador, this 12<sup>th</sup> day of January, 2015.



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Thomas Johnson, Q.C.

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