

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.

**CONSUMER ADVOCATE
REQUESTS FOR INFORMATION
CA-NP-25 to CA-NP-33
Issued: January 12, 2015**

CA-NP-25 (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*”. Is there a case to be made for moving winter readiness forward from December 1 to November 1, or perhaps, November 15?

CA-NP-26 In relation to Attachment A to CA-NP-016, Newfoundland Power Critical Feeders January 2-8, 2014 please advise of the following;

- i) Where the specific critical customer has not been identified please provide the name for same ie. reference is made to “Hospital”, “Senior’s Home” etc.,
- ii) Were there any other critical customers identified for each of the Critical Feeders? Please identify same and the basis for designation as critical;
- iii) What was the basis upon which the customers identified were designated as critical;
- iv) Was any attempt made to determine whether the critical customers identified possessed back up power generation and if same was available and to what capacity?

CA-NP-27 In relation to Newfoundland Power’s reply to CA-NP-016 please provide Newfoundland Power’s full critical customer list as of January 2, 2014 including the name of the critical customer, the date of inclusion on the list of critical customers, the basis for inclusion as a critical customer, the feeder for the particular critical customer as well as whether this customer remains on the critical customer list.

- CA-NP-28 In relation to Newfoundland Power's reply to CA-NP-016 reference is made to "Newfoundland Power's primary criteria for designating critical customers". Please advise as to whether that criteria has been used for designation, the process for the adoption of same and any policies or procedures maintained by Newfoundland Power in relation to the adoption and interpretation of such criteria.
- CA-NP-29 In relation to Newfoundland Power's reply to CA-NP-016 please advise as to whether there are any policies or procedures within Newfoundland Power regarding the use and application of critical customer lists.
- CA-NP-30 In relation to Newfoundland Power's reply to CA-NP-016 please advise what efforts, if any, have been made for input from the public or any third party source regarding the creation or maintenance of the critical customer list.
- CA-NP-31 In relation to Newfoundland Power's reply to CA-NP-016 please advise if the content of the critical customer list had been disclosed to the public utilities board prior to January 2, 2014 and if so, what specifically was disclosed to the public utilities board.
- CA-NP-32 In relation to Newfoundland Power's reply to CA-NP-016 please advise whether the content of the critical customer list had ever been disclosed to the public utilities board and if not, why not.
- CA-NP-33 In relation to Newfoundland Power's reply to CA-NP-016 please advise if the content of the critical customer list has been disclosed to the public utilities board subsequent to January 2, 2014 and if so what specifically was disclosed.

Dated at St. John's in the Province of Newfoundland and Labrador, this 12th day of January, 2015.



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