

1 **IN THE MATTER OF**
2 the *Electrical Power Control Act, 1994*,
3 SNL 1994, Chapter E-5.1 (the “*EPCA*”)
4 and the *Public Utilities Act, RSNL 1990*,
5 Chapter P-47 (the “*Act*”), as amended; and
6

7 **IN THE MATTER** of the Board’s Investigation
8 and Hearing into Supply Issues and Power Outages
9 on the Island Interconnected System.

**DANNY DUMARESQUE
REQUESTS FOR INFORMATION**

DD-NLH-001 to DD-NLH-045

Issued: March 31, 2014

- 1 **DD-NLH-001** Please prepare electronic documents describing the offloading of fuel oil,
2 fuel storage and delivery of this fuel throughout the system at the
3 Holyrood Terminal Station to the boiler burners; including inspection,
4 testing and maintenance programs and practises. These documents should
5 describe the activities to be conducted by all equipment types and
6 respective logbook records for January, February, November 2013 and
7 January 2014.
8
- 9 **DD-NLH-002** Please provide the complete Laboratory Analysis done on shipments of
10 fuel oil received January 4, January 26, February 16, February 26 and
11 November 6, 2013. These results must show the time the test was
12 requested, when analysis received and the company which completed the
13 analysis.
14
- 15 **DD-NLH-003** Please provide all work orders outstanding as of January 1, 2013 in relation
16 to the boilers serving all 3 Units at the Holyrood Generating Station.
17
- 18 **DD-NLH-004** Please provide all legal advice, internal and external, received in the
19 preparation and execution of the contract between NL Hydro and
20 Trafigura SA, dated November 19, 2012.
21
- 22 **DD-NLH-005** Please provide an explanation of why the supplier was changed and the
23 results of the Public Tender closing November 2, 2012; including, how
24 many bidders there were and their cost.
25
- 26 **DD-NLH-006** Please provide the name of any individual or company acting as an Agent
27 of Trafigura SA.
28
- 29 **DD-NLH-007** Please provide the schedule of inspection on the strainers in the fuel system
30 at the Holyrood Generating Station and the inspection sheets for
31 December 2012, January and February 2013.
32
- 33 **DD-NLH-008** On Page 14 of the HOLYROOD FUEL OIL SYSTEM Report dated
34 December 5, 2013 it states that “the quality of fuel oil deliveries in
35 January and February 2013 caused the strainers to plug with fuel oil such
36 that the Holyrood staff are cleaning the strainers almost daily to prevent
37 insufficient flow to the fuel oil pumps”. Please provide all logbook
38 reports, notes by staff, etc. which confirms the first date and time this
39 ‘plugging’ became evident to staff.
40
- 41 **DD-NLH-009** Please provide all reports showing the output of the Generating Units 1,2
42 and 3 in MW for December 2012 and January, February and March 2013.
43
- 44 **DD-NLH-010** Please confirm if any changes have been made to the contract for fuel oil
45 dated November 19, 2012 respecting the max levels of aluminum and
46 silicon in future shipments.

- 1 **DD-NLH-011** Please confirm if the contract signed November 19, 2012 contains a clause
2 which stipulates that testing of the fuel oil must be done at point of
3 loading. If not, will you undertake to have this legal requirement along
4 with having the results of such analysis satisfactory to the Buyer before
5 shipping is confirmed?
6
- 7 **DD-NLH-012** Please confirm if any claims have been made by Trafigura SA to NL Hydro
8 since the shipment on January 4, 2013. If so, please provide the nature of
9 such claims and if they have all been settled at what cost. Please provide
10 the details of any unsettled claims.
11
- 12 **DD-NLH-013** Please provide a list of all fuel oil purchased and or accessed in NL in
13 December 2013 and January 2014, the source and the cost.
14
- 15 **DD-NLH-014** Please confirm the destination of all fuel oil purchases in December 2013
16 and January 2014.
17
- 18 **DD-NLH-015** Please provide the daily fuel oil tank readings for December 2013 and
19 January 2014 at the Holyrood, Hardwoods and Stephenville fuel storage
20 tanks.
21
- 22 **DD-NLH-016** Please provide all reports on the fuel oil problems at Stephenville and
23 Hardwoods Generating Stations in December 2013 and January 2014
24 including all work orders and if any orders are outstanding.
25
- 26 **DD-NLH-017** Please indicate if any fuel oil was purchased and or accessed in NL and
27 used at the Holyrood Generating Station in December 2013 and January
28 2014. If so, please explain why.
29
- 30 **DD-NLH-018** Please provide the complete Laboratory Analysis of all shipments of fuel
31 oil received from ConocoPhillips in 2012.
32
- 33 **DD-NLH-019** Please confirm the name, address and contact person of the company which
34 completed the analysis of the fuel oil delivered to the Holyrood
35 Generating Station in 2012.
36
- 37 **DD-NLH-020** Please provide all communication between Hydro staff and Trafigura SA in
38 January and February 2013 including, emails, faxes or minutes of any
39 telephone calls and conference calls.
40
- 41 **DD-NLH-021** Please provide all minutes of conference calls and or meetings of Hydro
42 officials concerning the Holyrood Generating Station in January and
43 February 2013.
44
- 45 **DD-NLH-022** Please provide copies of all correspondence, including minutes of calls or
46 conference calls, emails or faxes between Hydro and or Nalcor and the

- 1 Government of NL, particularly the Department of Natural Resources and
2 the Premier's Office concerning the Holyrood Generating Station in
3 January and February, 2013.
4
- 5 **DD-NLH-023** Please confirm if any fuel oil was taken out of the Holyrood Fuel Storage
6 Facilities in 2013 and if so, where would it have been discarded.
7
- 8 **DD-NLH-024** Please provide the output of each generating unit which totalled 1022 MW,
9 prior to the initial event of January 11, 2013.
10
- 11 **DD-NLH-025** Please explain why Unit 3 was only loaded to 68 MW at the time of the
12 trip at 0413 hrs. January 11, 2013.
13
- 14 **DD-NLH-026** Please explain why Units 1&2 were only loaded to 110 MW at the time of
15 their tripping at 0642 hrs. January 11, 2013.
16
- 17 **DD-NLH-027** Please explain what work was being done to get Unit 3 back on line from
18 0413 to 0630, January 11, 2013.
19
- 20 **DD-NLH-028** Please provide any work orders or records of any kind to confirm the type
21 of work related to the fuel oil systems to Unit 2 and Unit 3 between 0700
22 hrs. January 11, 2013 at 1500 hrs. January 12, 2013.
23
- 24 **DD-NLH-029** Please confirm the maximum working hours per operators at Holyrood and
25 was there any concern about having such staff work 20-30 hours.
26
- 27 **DD-NLH-030** Please detail how the established maintenance test procedures did not
28 adequately validate the system function for the direct current (DC)
29 lubrication oil pump on January 11, 2013.
30
- 31 **DD-NLH-031** Please provide the voltage available on the station service system at 0640
32 hrs. January 11, 2013.
33
- 34 **DD-NLH-032** Please confirm when Unit 1 was released for service in 2013 and when the
35 first testing of the Unit was completed to achieve full production.
36
- 37 **DD-NLH-033** Please provide a full list of the On-Call Executives for the 2013 Corporate
38 Emergency Response Plan.
39
- 40 **DD-NLH-034** Please explain why, knowing the severity of the weather forecast on January
41 10th and 11th, 2013, the Executive On-Call was the Vice-President of
42 Customer Service.
43
- 44 **DD-NLH-034** Please outline the diesel engine capacity available to power the Holyrood
45 plant after 0700 hrs. on January 11, 2013 and how long this capacity was
46 required.

- 1 **DD-NLH-035** Please provide the guidelines for insulation creepage for areas of high
2 contamination such as a breaker stack.
3
- 4 **DD-NLH-036** Please confirm if you qualify salt as a contaminant.
5
- 6 **DD-NLH-037** Please confirm if there was a brown out experienced inside the Holyrood
7 Generating Station on January 12th or 13th, 2013.
8
- 9 **DD-NLH-038** Please confirm the status of the breaker replacement program at Holyrood.
10
- 11 **DD-NLH-039** Please provide the external peer review completed on the Root Cause
12 Analysis of the Holyrood Unit 1, January 11, 2013 Failure.
13
- 14 **DD-NLH-040** Please provide all reports of work completed under the 2012 Major Overall
15 of Unit 1.
16
- 17 **DD-NLH-041** Please provide all external inspection reports associated with the 2012 Major
18 Overall of Unit 1.
19
- 20 **DD-NLH-042** Please provide the contact information of the Insurance Company which
21 covers the Holyrood Generating Plant.
22
- 23 **DD-NLH-043** Please provide any inspection reports of the Insurance Company respecting
24 Unit 1 failure on January 11, 2013.
25
- 26 **DD-NLH-044** Please provide the results of any insurance claims made concerning the cost
27 of repairing Unit 1 in 2013.
28
- 29 **DD-NLH-045** Please outline the backup plan for the supply of #6 fuel oil in the event that
30 the new supply was not delivered in January and February, 2013. This
31 plan should include the name of the company and any terms and
32 conditions of the alternate supply contractor.
33

DATED at St. John's, Newfoundland this 31st day of March, 2014.

Per

Danny Dumaresque,
Intervenor