



Cabot Place, 1100 – 100 New Gower Street, P.O. Box 5038  
St. John's NL A1C 5V3 Canada tel: 709.722.4270 fax: 709.722.4565 [stewartmckelvey.com](http://stewartmckelvey.com)

September 24, 2014

Paul L. Coxworthy  
Direct Dial: 709.570.8830  
[pcoxworthy@stewartmckelvey.com](mailto:pcoxworthy@stewartmckelvey.com)

**Via Electronic Mail and Courier**

Newfoundland and Labrador Board  
of Commissioners of Public Utilities  
120 Torbay Road  
P.O. Box 21040  
St. John's, NL A1A 5B2

**Attention: Ms. G. Cheryl Blundon, Director of Corporate Services  
and Board Secretary**

Dear Ms. Blundon:

**Re: Board's Investigation into Supply Issues and Power Outages on the Island  
Interconnected System**

Please find enclosed the original and twelve (12) copies of the Requests for Information IC-NLH-012 to IC-NLH-021 of the Island Industrial Customer Group.

We trust you will find the enclosed to be in order.

Yours truly,

Stewart McKelvey

Paul L. Coxworthy

PLC/kmcd

Enclosures

- c. Geoffrey P. Young, Senior Legal Counsel, Newfoundland and Labrador Hydro
- Thomas J. Johnson, Q.C. Consumer Advocate
- Gerard Hayes, Newfoundland Power
- Dean A. Porter, Poole Althouse
- Danny Dumaresque
- Roberta Frampton Benefiel, Grand Riverkeeper Labrador Inc.

**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.

---

**ISLAND INDUSTRIAL CUSTOMERS  
REQUESTS FOR INFORMATION  
IC-NLH-012 to IC-NLH-021**

**Issued: September 24, 2014**

---




- 1 **IC-NLH-015** If the answer to IC-NLH-013 is in the affirmative, then  
2 explain, in detail, how any incremental increase in the  
3 volume of water will be measured and calculated, and how  
4 that incremental increase will be translated into quantifiable  
5 “Stored Energy”?
- 6 **IC-NLH-016** If the answer to IC-NLH-012 and/or IC-NLH-013 is in the  
7 affirmative, then with reference to section 1.5(b) of the  
8 Energy and Capacity Agreement Agreement, explain, in  
9 detail, the scenarios under which Nova Scotia Block Energy  
10 attributed to the Muskrat Falls Plant may or shall include  
11 Energy generated from Stored Energy?
- 12 **IC-NLH-017** With reference to Hydro’s response to IC-NLH-009, and  
13 acknowledging that Brush Electric have identified that the  
14 use of 18-5 stainless steel for the subject retaining rings was  
15 discontinued in the late 1980’s, what inquiries and  
16 investigation has Hydro made, and what measures has  
17 Hydro taken, to ensure that components of the 100 MW  
18 Combustion Turbine in the process of being installed at  
19 Holyrood will not be susceptible to corrosion or other wear  
20 and adverse conditions due to its close proximity to a coastal  
21 climate and coastal conditions?
- 22 **IC-NLH-018** With reference to IC-NLH-017, if the 100 MW Combustion  
23 Turbine will be susceptible to corrosion or other wear and  
24 adverse conditions due to its close proximity to a coastal  
25 climate and coastal conditions, what inspection and  
26 maintenance regime has Hydro identified that can be put in  
27 place to detect such problems in a timely and reliable  
28 manner?
- 29 **IC-NLH-019** With reference to Hydro’s response to IC-NLH-011, was the  
30 increases in employee person hours and contractor  
31 expenditures in 2013 and 2014, relative to previous years,  
32 planned (i.e. specifically budgeted for) by Hydro or  
33 unplanned (for example, in response to events such as the  
34 January 2013 and January 2014 outage events)?
- 35 **IC-NLH-020** With reference to Hydro’s response to IC-NLH-011, please  
36 update Hydro’s projected employee person hours and  
37 contractor expenditures for 2014 since that response.
- 38

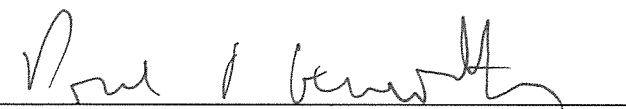
1 **IC-NLH-021** With reference to Hydro's response to IC-NLH-011, please  
2 provide Hydro's projected employee person hours and  
3 contractor expenditures, dedicated to the inspection and  
4 maintenance of Hydro's terminal stations and substations,  
5 on an annual basis, for the period 2015-2020.

**DATED** at St. John's, in the Province of Newfoundland and Labrador, this 24<sup>th</sup> day of September, 2014.

**POOLE ALTHOUSE**

for Per:   
Dean A. Porter

**STEWART MCKELVEY**

Per:   
Paul L. Coxworthy

TO: The Board of Commissioners of Public Utilities  
Suite E210, Prince Charles Building  
120 Torbay Road  
P.O. Box 21040  
St. John's, NL A1A 5B2

Attention: Board Secretary

TO: Newfoundland & Labrador Hydro  
P.O. Box 12400  
500 Columbus Drive  
St. John's, NL A1B 4K7

Attention: Geoffrey P. Young,  
Senior Legal Counsel

TO: Thomas Johnson, Q.C., Consumer Advocate  
O'Dea, Earle Law Offices  
323 Duckworth Street  
St. John's, NL A1C 5X4

TO: Newfoundland Power Inc.  
P.O. Box 8910  
55 Kenmount Road  
St. John's, NL A1B 3P6

Attention: Gerard Hayes,  
Senior Legal Counsel

TO: Roberta Frampton Benefiel  
Vice President  
Grand Riverkeeper Labrador Inc.  
Box 569, Station B  
Happy Valley-Goose Bay, NL A0P 1E0

TO: Danny Dumaresque  
213 Portugal Cove Road  
St. John's, NL A1B 2N5