

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 regulations  
6 thereunder; and  
7  
8 **IN THE MATTER OF** an application by Newfoundland  
9 And Labrador Hydro for approval of a capital project to  
10 supply and install 100MW of combustion turbine generation,  
11 pursuant to section 41 of the *ACT*.

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**DANNY DUMARESQUE  
REQUESTS FOR INFORMATION**

**GT-DD-NLH-01 to GT-DD-NLH-25**

**Issued: May 26, 2014**

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- 1 **GT-DD-NLH-01** Please provide a complete copy of the contract to purchase and supply the  
2 100 MW combustion turbine.  
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- 4 **GT-DD-NLH-02** Please provide a copy of all inspections and particularly, any third party  
5 inspection of this unit confirming the readiness of this unit.  
6
- 7 **GT-DD-NLH-03** Please confirm if your officials have observed this unit in operation.  
8
- 9 **GT-DD-NLH-04** Please confirm if any modifications has to be done to this unit and if they  
10 will be done at point of sale and at what cost.  
11
- 12 **GT-DD-NLH-05** Please provide a copy of the insurance policy governing the transmission  
13 of this unit from point of sale to Holyrood.  
14
- 15 **GT-DD-NLH-06** Please confirm the type of fuel this unit will use, the current price and  
16 projected cost of a 30 days continuous usage.  
17
- 18 **GT-DD-NLH-07** Please confirm if the fuel supply will come from the current supplier to the  
19 Holyrood station.  
20
- 21 **GT-DD-NLH-08** Please confirm if the supply of fuel to the unit will come from the existing  
22 tank farm or from a new tank source. If a new source, please provide  
23 certification for this installation by all required authorities.  
24
- 25 **GT-DD-NLH-09** Please provide confirmation and copy of the guarantee which comes with  
26 the unit, including parts and service.  
27
- 28 **GT-DD-NLH-10** Please provide the status of the mobilization and a timeline for  
29 commissioning.  
30
- 31 **GT-DD-NLH-11** Please provide a copy of the tender documents issued for this generation  
32 and a copy of all the results received.  
33
- 34 **GT-DD-NLH-12** Please explain the difference between this generation requirement and that  
35 scheduled as part of the Labrador Infeed Option, commonly referred to as  
36 the Muskrat Falls option which has now been sanctioned.  
37
- 38 **GT-DD-NLH-13** Please explain why the cost of this generation should be borne by  
39 ratepayers now instead of being a capital expenditure of the thermal  
40 component to the Labrador Infeed Option.  
41
- 42 **GT-DD-NLH-14** Please provide all correspondence between Hydro/ Nalcor and the  
43 Government of Newfoundland and Labrador regarding the purchase and  
44 costing of this generating asset.  
45

- 1 **GT-DD-NLH-15** Please provide all legal opinions regarding the risk and or associated  
 2 liabilities of purchasing this 100 MW unit.  
 3
- 4 **GT-DD-NLH-16** Please outline the financial consequences to the supplier of this unit if it is  
 5 not in use on December 1, 2014.  
 6
- 7 **GT-DD-NLH-17** Please provide a list of alternative supply options for the current  
 8 generation requirement such as wind power.  
 9
- 10 **GT-DD-NLH-18** Please confirm if all engineering associated with this project and if so,  
 11 what is the current total cost of commissioning this unit.  
 12
- 13 **GT-DD-NLH-19** Please confirm if any circumstances has affected the December 1, 2014  
 14 commissioning date.  
 15
- 16 **GT-DD-NLH-20** Please confirm if the purchase price was in US or CAN currency.  
 17
- 18 **GT-DD-NLH-21** Please confirm if current employees are trained to operate this unit.  
 19
- 20 **GT-DD-NLH-22** Please confirm if there will be any new positions created with the  
 21 commissioning of this unit. If so, please describe and provide the costing  
 22 of these positions.  
 23
- 24 **GT-DD-NLH-23** Please provide the previous operating and/or maintenance records of this  
 25 unit prior to purchase.  
 26
- 27 **GT-DD-NLH-24** Please indicate if cost recovery for this unit will be sought through a rate  
 28 application.  
 29
- 30 **GT-DD-NLH-25** Please confirm the expected rate increase to ratepayers because of this  
 31 capital expenditure  
 32

**DATED** at St. John's, Newfoundland this 26<sup>th</sup> day of May, 2014.

Per \_\_\_\_\_

**Danny Dumaresque, Intervenor**