

DANNY DUMARESQUE
213 Portugal Cove Road
St. John's, NL A1B 2N5

E-mail: gyoung@nlh.nl.ca

2014-09-23

Mr. Geoffrey Young
Newfoundland and Labrador Hydro
P.O.Box 12400
St. John's, NL A1B 4K7

Dear Sirs:

RE: An Application by Newfoundland and Labrador Hydro for approval of a capital project to supply and install 100MW of combustion turbine generation, pursuant to section 41 of the ACT – Request for Information

Enclosed are Information Requests GT-DD-NLH-26 to GT-DD-NLH-50 regarding the above-noted matter.

If you have any questions, please do not hesitate to contact me, via email danny.liberal@gmail.com or (709) 685-5719.

Sincerely yours,

Danny Dumaresque
Intervenor

Encl.

cc.

NEWFOUNDLAND POWER INC.

Mr. Gerard Hayes, E-Mail: ghayes@newfoundlandpower.com

Ian Kelly, QC, E-Mail: ikelly@curtisdawe.com

CONSUMER ADVOCATE

Mr. Thomas Johnson, E-Mail: tjohnson@odeaearle.ca

Ms. Colleen Lacey, E-Mail: clacey@odeaearle.ca

ISLAND INDUSTRIAL CUSTOMER GROUP

Mr. Paul Coxworthy, E-Mail: pcoxworthy@stewartmckelvey.com

Mr. Dean Porter, E-Mail: dporter@pa-law.ca

PUBLIC UTILITIES BOARD

Ms. Cheryl Blundon, E-Mail: cblundon@pub.nl.ca

Ms. M. Greene, E-Mail: mgreene@pub.nl.ca

Mr. Fred Winsor, E-Mail: winsorf@nl.rogers.com

Mr. Tom O'Reilly, E-Mail: toreilly@coxandpalmer.com

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*.

DANNY DUMARESQUE
REQUESTS FOR INFORMATION

GT-DD-NLH-26 to GT-DD-NLH-50

Issued: September 23, 2014

- 1 **GT-DD-NLH-26** Please provide the tender security given by ProEnergy Sevices LLC to
2 meet the 10% requirement in the Tender Call.
3
- 4 **GT-DD-NLH-27** Please provide the name and address of the original owner of the turbine
5 purchased and a copy of the original documents which accompanied the
6 unit.
7
- 8 **GT-DD-NLH-28** Please explain why there was no Professional Appraisal done on this unit
9 to determine condition and fair market value.
10
- 11 **GT-DD-NLH-29** Please provide all documentation of the internal inspection of the relevant
12 unit component parts.
13
- 14 **GT-DD-NLH-30** Please confirm if you were aware of the advertisement by ProEnergy Parts
15 Solution and CFAS Enterprises Inc. *1 x New Siemens SGTG-3000E Gas*
16 *Turbine Package*. If so, did you receive a copy of the offer and
17 particularly, if you receive the contents of the advertised complete
18 package. If so, please provide this information.
19
- 20 **GT-DD-NLH-31** Please confirm if you were aware that this Complete Package was
21 advertised for \$23 million US. If so, did you bring this to the attention of
22 ProEnergy Services.
23
- 24 **GT-DD-NLH-32** Please provide a copy of the Manufacturer's Warranty on this Unit.
25
- 26 **GT-DD-NLH-33** Please confirm if the major components of this Unit had been protected by
27 a nitrogen blanket. If so, please provide the documentation.
28
- 29 **GT-DD-NLH-34** Please provide confirmation that this equipment is compatible with the
30 equipment at the Holyrood Station.
31
- 32 **GT-DD-NLH-35** Please explain why there was a \$8 million allowance for the construction
33 of the building rather than going to public tender in this province.
34
- 35 **GT-DD-NLH-36** Please indicate when and how you became aware of the investigation by
36 US authorities into ProEnergy Services and what due diligence did you do
37 upon learning of this matter.
38
- 39 **GT-DD-NLH-37** Please provide the certification or other documentation showing that
40 ProEnergy Services LLC had clear title of ownership to this CTG package
41 when tenders closed on April 21, 2014.
42
- 43 **GT-DD-NLH-38** Please explain why hydro signed two contracts, one with ProEnergy
44 Services LLC and another with its Canadian subsidiary when there was
45 only one company, ProEnergy Services LLC, who submitted a tender.
46

- 1 **GT-DD-NLH-39** Please advise if you have had any contact from any US authority
 2 concerning ProEnergy Services LLC to date. Do you still have confidence
 3 that this company will complete this project as contracted.
 4
- 5 **GT-DD-NLH-40** Please explain and provide documentation showing where this Turbine
 6 was stored and the maintenance records from 2007 to 2009.
 7
- 8 **GT-DD-NLH-41** Please provide all studies showing the emissions which will result from
 9 the operation of this CTG and provide a comparison to the existing
 10 emissions from the installed units at Holyrood.
 11
- 12 **GT-DD-NLH-42** Please provide the documentation confirming that this unit can operate in
 13 our climate and the planned maintenance program associated with it over
 14 the next 2 years.
 15
- 16 **GT-DD-NLH-43** Please confirm if all employees have been hired to operate this plant and if
 17 they have received all the training required.
 18
- 19 **GT-DD-NLH-44** Please role will ProEnergy Sservice's Canadian subsidiary play in this
 20 project.
 21
- 22 **GT-DD-NLH-45** Please provide a complete breakdown of the expenditures to date on the
 23 contract with ProEnergy Services LLC and its Canadian Subsidiary.
 24
- 25 **GT-DD-NLH-46** Please provide a copy of all other contracts awarded to complete this
 26 project, including the value of each.
 27
- 28 **GT-DD-NLH-47** Please provide a copy of the contract with the Consultant as indicated in
 29 the Application to the PUB in April, 2014 with an estimated cost of \$1.8
 30 million.
 31
- 32 **GT-DD-NLH-48** Please provide copies of any quotes received from CT manufactuerers. If
 33 none, received, why weren't they requested.
 34
- 35 **GT-DD-NLH-49** Please explain why you chose to select 7 year old turbine and 5 year old
 36 generator when you had the opportunity to purchase new equipment with
 37 full manufacturer's warranty and the ability to be flexible in using less
 38 than 100 MW when required.
 39
- 40 **GT-DD-NLH-50** Please confirm the expected rate increase to ratepayers with the present
 41 estimated cost of project completion.

DATED at St. John's, Newfoundland this 23th day of September, 2014.

Per _____

Danny Dumaresque, Intervenor