

# Office of the Consumer Advocate

PO Box 23135  
Terrace on the Square  
St. John's, NL Canada  
A1B 4J9

Tel: 709-724-3800  
Fax: 709-754-3800

April 2, 2025

Board of Commissions of Public Utilities  
120 Torbay Road, P.O. Box 2140  
St. John's, NL A1A 5B2

**Attention: Jo Galarneau**  
**Executive Director and Board Secretary**

Dear Ms. Galarneau:

**Re: Newfoundland and Labrador Hydro –**  
**Application for Early Execution Capital Work for**  
**Bay d'Espoir Unit and an Avalon Combustion Turbine**  
**- Requests for Information**

Further to the above-captioned, enclosed are the Consumer Advocate's Requests for Information numbered CA-NLH-001 to CA-NLH-004.

Please note that we are still reviewing the Application and we reserve the right to file further Requests for Information as required.

Yours truly,



Stephen Fitzgerald, KC  
Counsel for the Consumer Advocate

Encl.  
/bb

cc **Newfoundland & Labrador Hydro**  
Shirley Walsh ([ShirleyWalsh@nlh.nl.ca](mailto:ShirleyWalsh@nlh.nl.ca))  
NLH Regulatory ([Regulatory@nlh.nl.ca](mailto:Regulatory@nlh.nl.ca))

**Newfoundland Power Inc.**  
Dominic J. Foley ([dfoley@newfoundlandpower.com](mailto:dfoley@newfoundlandpower.com))  
Douglas Wright ([dwright@newfoundlandpower.com](mailto:dwright@newfoundlandpower.com))  
NP Regulatory ([regulatory@newfoundlandpower.com](mailto:regulatory@newfoundlandpower.com))

**Board of Commissioners of Public Utilities**  
Board General ([board@pub.nl.ca](mailto:board@pub.nl.ca))  
Jacqui Glynn ([jglynn@pub.nl.ca](mailto:jglynn@pub.nl.ca))  
Maureen Greene ([mgeene@pub.nl.ca](mailto:mgeene@pub.nl.ca))  
Colleen Jones ([cjones@pub.nl.ca](mailto:cjones@pub.nl.ca))  
Katie Philpott ([kphilpott@pub.nl.ca](mailto:kphilpott@pub.nl.ca))

**Industrial Customers Group**  
Paul Coxworthy ([pcoxworthy@stewartmckelvey.com](mailto:pcoxworthy@stewartmckelvey.com))  
Denis Fleming ([dfleming@coxandpalmer.com](mailto:dfleming@coxandpalmer.com))  
Glen Seaborn ([gseaborn@poolealthouse.ca](mailto:gseaborn@poolealthouse.ca))

**Labrador Interconnected Group**  
Senwung Luk ([sluk@oktlaw.com](mailto:sluk@oktlaw.com))  
Nick Kennedy ([nkennedy@oktlaw.com](mailto:nkennedy@oktlaw.com))

**IN THE MATTER OF** the *Electric Power Control Act*, 1994, SNL 1994, Chapter E-5.1 (“EPCA”) and the *Public Utilities Act*, RSNL 1990, Chapter P-47 (“Act”), and regulations thereunder; and

**IN THE MATTER OF** an Application by Newfoundland and Labrador Hydro (“Hydro”) for an Order approving the capital expenditures necessary for certain capital related to the future construction of Bay d’Espoir Hydroelectric Generating Facility (“BDE”) Unit 8 and the Avalon Combustion Turbine (“Avalon CT”), pursuant to Section 41(3) of the Act.

---

**CONSUMER ADVOCATE  
REQUESTS FOR INFORMATION  
CA-NLH-001 to CA-NLH-004**

**Issued: April 2, 2025**

---

- 1 CA-NLH-001 By filing the Bay d'Espoir Unit 8 and the Avalon CT Early Execution  
2 Capital Work application and a second application for Capital  
3 Expenditures:  
4 a) How much time on the schedule does NL Hydro expect to save over  
5 filing a single application for Capital Expenditures?  
6 b) What is the additional regulatory cost associated with filing two  
7 applications rather than one?  
8 c) How much money does Hydro expect to save as a result of filing the  
9 Early Execution Capital Work Application relative to filing a single  
10 application for Capital Expenditures?  
11 d) Please quantify the schedule and cost risk mitigated by filing the Early  
12 Execution Application.  
13
- 14 CA-NLH-002 Please confirm that if the application for Capital Expenditures is disallowed  
15 by the Board, customers will bear no costs associated with the Early  
16 Execution Application.  
17
- 18 CA-NLH-003 Why are supply chain pressures continuing to increase, and when does  
19 Hydro expect such pressures to subside?  
20
- 21 CA-NLH-004 Is there a way for the Board to expedite the application for Capital  
22 Expenditures that would essentially eliminate any perceived benefits from  
23 filing the Early Execution Capital Work application?

**DATED** at St. John's, Newfoundland and Labrador, this 2<sup>nd</sup> day of April, 2025.

Per: 

**Stephen Fitzgerald, KC**

**Counsel for the Consumer Advocate**

Terrace on the Square, Level 2, P.O. Box 23135

St. John's, Newfoundland & Labrador A1B 4J9

Telephone: (709) 724-3800

Telecopier: (709) 754-3800

Email: [dbrowne@bfma-law.com](mailto:dbrowne@bfma-law.com)