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November 13, 2026

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

Attention: Mike McNiven
Senior Regulatory Advisor & Board Secretary

Re: 2026 General Rate Application – Requests for Information on Expert Reports

Please find enclosed Newfoundland and Labrador Hydro's ("Hydro") requests for information NLH-IIC-001 to NLH-IIC-016 in relation to Hydro's 2026 General Rate Application.

Should you have any questions, please contact the undersigned.

Yours truly,

NEWFOUNDLAND AND LABRADOR HYDRO

Shirley A. Walsh
Senior Legal Counsel, Regulatory
SAW/kd

Encl.

ecc:

Board of Commissioners of Public Utilities
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Board General
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Island Industrial Customer Group
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Labrador Interconnected Group
Nicholas E. Kennedy, Olthuis Kleer Townshend LLP

Iron Ore Company of Canada
Gregory A.C. Moores, KC, Stewart McKelvey

Newfoundland and Labrador Hydro External Counsel
Daniel W. Simmons, KC, McInnes Cooper

IN THE MATTER OF the *Electrical Power Control Act, 1994*, SNL 1994, Chapter E-5.1 and the *Public Utilities Act*, RSNL 1990, Chapter P-47, and regulations thereunder; and

IN THE MATTER OF a general rate application by Newfoundland and Labrador Hydro to establish customer electricity rates for 2027.

Newfoundland and Labrador Hydro

Requests for Information

NLH-IIC-001 to NLH-IIC-016

November 13, 2026

Island Industrial Customer Rate Design

NLH-IIC-001 **Reference: Pre-filed Testimony of Patrick Bowman, sec. 5.3.2, p. 40.**

Does the Island Industrial Customer Group agree that all capacity costs are recovered by a combination of the demand charge and the Block 1 energy charge?

NLH-IIC-002 **Reference: Pre-filed Testimony of Patrick Bowman, sec. 5.3.2, p. 40.**

Is Issue 1 suggesting that Newfoundland and Labrador Hydro should put marginal capacity cost into its demand charge price and into its Block 2 prices?

NLH-IIC-003 **Reference: Pre-filed Testimony of Patrick Bowman, sec. 5.3.2, p. 40.**

Regarding demand cost recovery, does Mr. Bowman believe that all utilities should recover all demand-related costs fully via demand charge?

NLH-IIC-004 **Reference: Pre-filed Testimony of Patrick Bowman, sec. 5.3.2, pp. 40–41.**

Is Mr. Bowman aware that the Hours of Use design, in its simplest form, has no demand charge and collects all demand-related costs via the Block 1 energy charge?

NLH-IIC-005 **Reference: Pre-filed Testimony of Patrick Bowman, sec. 5.3.2, pp. 40–41.**

Regarding Block 2 pricing, the Hours of Use design prices marginal consumption for Island Industrial customers in a manner identical to that of its pricing to Newfoundland Power Inc.. Does Mr. Bowman mean to suggest that both the Island Industrial customer and the Newfoundland Power Inc. rates' pricing be revised?

NLH-IIC-006 **Reference: Pre-filed Testimony of Patrick Bowman, sec. 5.3.2, pp. 40–41.**

Would Mr. Bowman agree that a customer with a high annual load factor can nevertheless have a high contribution to winter peak and impose greater marginal capacity costs?

NLH-IIC-007 **Reference: Pre-filed Testimony of Patrick Bowman, sec. 5.3.2, pp. 40–41.**

The report notes concerns that the winter Block 2 price discourages winter usage. Please clarify why the rate should encourage additional winter energy use if winter incremental consumption has a higher export opportunity cost?

NLH-IIC-008 **Reference: Pre-filed Testimony of Patrick Bowman, sec. 5.3.2, pp. 40–41.**

As explained in the CA Energy Consulting report, the marginal price is the combination of the demand charge per kW applied over current and future months, multiplied by the probability of exceeding Power on Order, plus the marginal price of energy. Is Issue 2 suggesting that the demand price signal in the proposed Hours of Use design is inadequate in the winter season only, or all year as well? Please explain why the customer's price signal associated with increasing firm load above Power on Order is considered insufficient to control peak demand?

NLH-IIC-009 **Reference: Pre-filed Testimony of Patrick Bowman, sec. 5.3.3, Recommendation No. 12, p. 45.**

If the Board of Commissioners of Public Utilities does not approve the proposed Hours of Use design, do the Island Industrial Customer Group recommend the existing rate form with the illustrative $12.00/kW demand charge and 4.77¢/kWh energy charge? If not, please clarify what interim rate the Island Industrial Customer Group would recommend.

NLH-IIC-010 **Reference: Pre-filed Testimony of Patrick Bowman, sec. 5.3.3, p. 45.**

Please explain why $12.00/kW is the appropriate demand charge rather than $10.73, $17.54, $28.88, or a marginal-capacity value.

NLH-IIC-011 **Reference: Pre-filed Testimony of Patrick Bowman, sec. 5.3.3, pp. 45–46.**

Does Mr. Bowman's recommended reduction to winter Block 2 price depart from marginal-cost pricing? If so, please describe the cost or policy basis that supports the departure?

Specifically Assigned Charges

NLH-IIC-012 **Reference: Pre-filed Testimony of Patrick Bowman, sec. 6.2, p. 55.**

Please describe any changes to the operations of the Long Harbour facility formerly operated by Praxair Inc. resulting from the transition to Linde Canada, including changes to production activities, electricity requirements, and the commercial arrangements for supplying Vale Newfoundland and Labrador Limited. If no such changes occurred, please confirm.

NLH-IIC-013 **Reference: Pre-filed Testimony of Patrick Bowman, sec. 6.2, p. 55.**

Please confirm whether Linde's Long Harbour facility supplies products or services exclusively to Vale Newfoundland and Labrador Limited's operations or also supplies other customers. If the facility supplies other customers, please describe the nature of those products or services, indicate when such supply commenced, and provide the approximate proportion of the facility's output supplied to Vale and to other customers.

Cost of Service Methodology

NLH-IIC-014 **Reference: Pre-filed Testimony of Patrick Bowman, sec. 4.2, Recommendation No.3, p. 19.**

In the Cost of Service Methodology Settlement Agreement, filed as part of this general rate application on May 27, 2026, the Parties agreed that the coincident peaks used in Newfoundland and Labrador Hydro's Cost of Service Study should reflect the contribution of the different customer classes to the coincident peak used for planning purposes. Newfoundland and Labrador Hydro's Cost of Service Study filed in this General Rate Application is based on the same planning assumptions used in its Reliability and Resource Adequacy studies, which have consistently relied on P50 load forecasts since 2018.

Please explain why demand-related costs should be allocated using a P90 load condition rather than the P50 load condition used for planning purposes. In your response, please explain how Recommendation No. 3 is consistent with the settlement agreement and whether Recommendation No. 3 was considered during the development of the settlement agreement.

Newfoundland Power Inc. Generation Credit

NLH-IIC-015 **Reference: Pre-filed Testimony of Patrick Bowman, sec. 4.4, pp. 24–29.**

Does Mr. Bowman agree that the treatment of generation credits should be subject to a detailed review, with the results and any proposed changes reviewed in the next general rate application?

NLH-IIC-016 Reference: Pre-filed Testimony of Patrick Bowman, sec. 4.4.2, p. 26.

Please provide a calculation of the $13.091 million as a net system cost. Calculate the cost per kW based on the change in revenue requirement on an unmitigated basis.

DATED at St. John's, in the province of Newfoundland and Labrador, this 13th day of November 2026.



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