

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 approval of capital expenditures for section replacement and weld refurbishment of Penstock 3 at the Bay d’Espoir Hydroelectric Generating Facility, pursuant to Subsection 41(3) of the Act.

**CONSUMER ADVOCATE
REQUESTS FOR INFORMATION
CA-NLH-001 to CA-NLH-006**

Issued: April 29, 2025

- 1 CA-NLH-001 (Reference Application, para. 12) It is stated “*Due to the criticality of this*
2 *penstock to the system and the necessity of coordinating this work with other*
3 *ongoing projects at Bay d’Espoir as well as outage planning and ensuring*
4 *works are completed before winter-load periods, Hydro determined that work*
5 *must begin earlier in 2026 ...”.*
- 6 a) Please provide Hydro’s schedule for work to be undertaken at the Bay
7 d’Espoir hydro facility in the years 2027 through 2032.
- 8 b) Please provide Hydro’s schedule for projects to be undertaken on its existing
9 and new thermal and hydro generating facilities for the years 2027 through
10 2032.
- 11 c) Please provide load and capacity tables for the Island System showing the
12 capacity reserve margins for the winter peak periods from 2026/27 through
13 2031/32.
- 14
- 15 CA-NLH-002 (Reference Schedule 1, page 3) With the completion of the section replacement
16 and refurbishment of Penstock 1, has there been any increase in energy output or
17 capacity from the Bay d’Espoir system?
18
19
- 20 CA-NLH-003 (Reference Schedule 1, page 4) With respect to the operational restrictions on
21 Units 5 and 6:
22 a) How long have those restrictions been in place?
23 b) Following the implementation of Option 3 for Penstock 3, would the removal
24 of the operational restrictions on Units 5 and 6 result in increased energy output
25 or greater peaking capacity from the Bay d’Espoir system?
26
- 27 CA-NLH-004 (Reference Schedule 1, page 14) It is stated “*The costs associated with a failure*
28 *during peak winter demand would also be significantly higher than those during*
29 *the summer months. Hydro estimates that the cost to replace 153 MW with*
30 *generation from the Holyrood Thermal Generating Station (TGS would be*
31 *approximately \$120/MWh.” Footnote 34 states “*Analysis based on Bay d’Espoir*
32 *Units 1 and 2 production data from the previous five years, January to March.*
33 *Economic offsets via the Maritime Link and Labrador-Island Link were not*
34 *considered. Assumed a Holyrood TGS Derated Adjusted Forced Outage Rate of*
35 *15%. Assumed Holyrood TGS full production during these months. Cost of*
36 *Bunker C is based on the June 2022 rate (\$147/bbl.)”**
- 37 a) Why were imports (or curtailed exports) over the LIL and Maritime Link not
38 considered for replacement capacity and energy?
39 b) Does this suggest that Holyrood TGS costs for both capacity and energy in the
40 winter months during this time frame should be the basis for marginal costs
41 on the IIS rather than the opportunity cost of exports?
42 c) A cost of \$120/MWh for production from Holyrood TGS appears low. Please
43 provide the calculation including all assumptions.
44 d) Is the October 2023 Marginal Cost Update the most recent version of Hydro’s
45 marginal costs? If not, please provide the latest version.
46
- 47 CA-NLH-005 (Reference Schedule 1, page 31) Has Hydro considered undertaking any
48 additional maintenance, refurbishment, or capital works while Penstock 3 is out

1 of service for repairs? If so, please describe those works.
2
3 CA-NLH-006 (Reference Schedule 2, page 4) Does Hydro plan to include the refurbishment of
4 Penstock 2 in a forthcoming Capital Budget Application or a supplemental
5 capital budget application?

DATED at St. John's, Newfoundland and Labrador, this 29th day of April, 2026.



Per: _____

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