



Cabot Place, 1100 – 100 New Gower Street, P.O. Box 5038
St. John's NL A1C 5V3 Canada tel: 709.722.4270 fax: 709.722.4565 stewartmckelvey.com

May 3, 2017

Paul L. Coxworthy
Direct Dial: 709.570.8830
pcoxworthy@stewartmckelvey.com

Via Electronic Mail and Courier

Newfoundland and Labrador Board
of Commissioners of Public Utilities
120 Torbay Road
P.O. Box 21040
St. John's, NL A1A 5B2

**Attention: Ms. G. Cheryl Blundon, Director of Corporate Services
and Board Secretary**

Dear Ms. Blundon:

**Re: Newfoundland and Labrador Hydro – Amended General Rate Application, Order
No. P.U. 49(2016) – Compliance Application, Order No. P.U. 14(2017)**

Please find enclosed the original and twelve (12) copies of the Requests for Information NARL-
NLH-1 to NARL-NLH-7, for filing on behalf of NARL Refining Limited Partnership only with the
Board.

We trust you will find the above and enclosed to be in order.

Yours truly,

Stewart McKelvey

Paul L. Coxworthy

PLC/dob
Enclosure
c.

<p>Newfoundland and Labrador Hydro Ms. Tracey Pennell, Email: traceypennell@nlh.nl.ca Mr. Geoff Young, Email: gyoung@nlh.nl.ca NLH Regulatory, Email: NLHRegulatory@NLH.nl.ca Newfoundland Power Inc. Mr. Gerard Hayes, Email: ghayes@newfoundlandpower.com Mr. Liam O'Brien, Email: lobrien@curtisdawe.com NP Regulatory, Email: regulatory@newfoundlandpower.com Consumer Advocate Mr. Dennis Browne, Q.C., Email: dbrowne@bfma-law.com Mr. Stephen Fitzgerald, Email: sfitzgerald@bfma-law.com Ms. Sarah Fitzgerald, Email: sarahfitzgerald@bfma-law.com Ms. Bernice Bailey, Email: bbailey@bfma-law.com Industrial Customer Group Mr. Dean Porter, Email: dporter@poolealthouse.ca</p>	<p>Teck Resources Limited Mr. Larry Bartlett, Email: larry.bartlett@teck.com Innu Nation Mr. Senwung Luk, Email: sluk@oktlaw.com Ms. Nancy Kleer, Email: nkleer@oktlaw.com Vale Newfoundland and Labrador Limited Mr. Thomas O'Reilly, Q.C., Email: toreilly@coxandpalmer.com Mr. Denis Fleming, Email: dfleming@coxandpalmer.com Mr. Jason Callan, Email: jason.callan@vale.com Nunatsiavut Government Ms. Genevieve Dawson, Email: gdawson@benisonbuffett.com Ms. Christina Goldhar, Email: christina_goldhar@nunatsiavut.com Mr. Christopher Henderson, Email: chenderson@lumosenergy.com Yvonne Jones MP, Labrador Email: Yvonne.Jones.A1@parl.gc.ca; Yvonne.Jones.C1@parl.gc.ca</p>
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IN THE MATTER OF the *Public Utilities Act*, R.S.N. 1990, Chapter P-47 (the "Act");

AND IN THE MATTER OF a General Rate Application by Newfoundland and Labrador Hydro to establish customer electricity rates for 2015;

AND IN THE MATTER OF an Amended General Rate Application filed by Newfoundland and Labrador Hydro on November 10, 2014;

AND IN THE MATTER OF an application (the GRA Compliance Application) by Newfoundland and Labrador Hydro for approval of changes to the rates, tolls and charges for the supply of power and energy to customers, and changes to the rules and regulations applicable to the supply of power and energy to customers, reflecting the determinations set out in Order No. P.U. 49(2016).

**NORTH ATLANTIC REFINING LIMITED PARTNERSHIP
REQUESTS FOR INFORMATION
NARL-NLH-1 to NARL-NLH-7**

Issued: May 3, 2017

IN THE MATTER OF the *Public Utilities Act*, R.S.N. 1990, Chapter P-47 (the "Act");

AND IN THE MATTER OF a General Rate Application by Newfoundland and Labrador Hydro to establish customer electricity rates for 2015;

AND IN THE MATTER OF an Amended General Rate Application filed by Newfoundland and Labrador Hydro on November 10, 2014;

AND IN THE MATTER OF an application (the GRA Compliance Application) by Newfoundland and Labrador Hydro for approval of changes to the rates, tolls and charges for the supply of power and energy to customers, and changes to the rules and regulations applicable to the supply of power and energy to customers, reflecting the determinations set out in Order No. P.U. 49(2016).

1 **REQUESTS FOR INFORMATION OF**
2 **NORTH ATLANTIC LIMITED PARTNERSHIP (NARL)**
3 **NARL-NLH-1 to NARL-NLH-7**

4
5 **NARL-NLH-1**

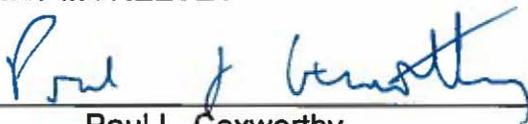
In Hydro's response to PUB-NLH-002 in this Compliance Application, Hydro states: "*No individual customer has an entitlement to the RSP balance. If an Island Industrial Customer leaves the system, the remaining customers would be responsible for the balance.*" Confirm that, under the rules and regulations governing Island Industrial Customer rates (and including the individual agreements between each IIC and Hydro for provision of electrical service), if an Island Industrial Customer leaves the system, the remaining Island Industrial Customers are not responsible to pay any specifically assigned charges due from but unpaid by that leaving Island Industrial Customer.

- 1 **NARL-NLH-2** With reference to the InterGroup prepared table at page 4 of
2 NARL's April 10, 2017 letter submission in this Compliance
3 Application, does Hydro consider the SAC Revenue
4 Deficiency identified for each IIC (except NARL, which is in a
5 Surplus position) to be due from that IIC (i.e \$1,862,00 due
6 from CBPP, \$61,000 due from Teck, \$1,647,000 due from
7 Vale, or some adjustment or refinement of those figures,
8 bearing in mind that InterGroup's calculations were
9 preliminary)?
- 10 **NARL-NLH-3** If Hydro had received approval for final rates arising out of its
11 2013 General Rate Application to be effective January 1,
12 2016 (not unrealistic timeframe if Hydro had not amended its
13 General Rate Application), would Hydro have proposed that
14 specifically assigned charge for Vale, and increases to those
15 charges in the case of CBPP and Teck, arising from the
16 GRA be offset, for the subsequent years 2016 and 2017,
17 from the RSP load variation credit balance allocated to the
18 IICs (or from any other credit balance in favour of the IICs)?
- 19 **NARL-NLH-4** If the Board does not grant approval to Hydro to offset the
20 portion of the Hydro revenue deficiency attributable to
21 uncollected specifically assigned charges in 2014, 2015,
22 2016 and 2017 from the RSP load variation credit balance
23 allocated to the IICs (or from any other credit balance in
24 favour of the IICs), how would Hydro propose to collect this
25 portion of Hydro revenue deficiency?
- 26 **NARL-NLH-5** How does Hydro propose to reimburse or credit NARL for
27 the surplus collection (or overcollection) by Hydro of
28 specifically assigned charges from NARL in 2014, 2015,
29 2016 and 2017?
- 30 **NARL-NLH-6** With reference to IC-NLH-17 and IC-NLH-18 filed in this
31 Compliance Application, please provide the same estimated
32 rate impacts to each Island Industrial Customer (i.e. not only
33 the average class impact), if NARL was reimbursed or
34 credited for the surplus collection (or overcollection) by
35 Hydro of specifically assigned charges from NARL in 2014,
36 2015, 2016 and 2017 from the RSP load variation credit
37 balance allocated to the IICs?
- 38 **NARL-NLH-7** With reference to IC-NLH-17 and IC-NLH-18, please provide
39 the same estimated rate impacts to each Island Industrial
40 Customer (i.e. not only the average class impact), if NARL
41 (and Praxair) was reimbursed or credited for the net surplus
42 revenue collected from them over the 2014 – 2017 period,

1 as calculated/estimated by the InterGroup prepared table at
2 page 4 of NARL's April 10, 2017 letter submission (i.e.
3 \$462,000 in respect of NARL; \$230,000 in respect of
4 Praxair), from the RSP load variation credit balance
5 allocated to the IICs?

DATED at St. John's, in the Province of Newfoundland and Labrador, this 3rd day of May, 2017.

STEWART MCKELVEY

Per: 
Paul L. Coxworthy

TO: The Board of Commissioners of Public Utilities
Suite E210, Prince Charles Building
120 Torbay Road
P.O. Box 21040
St. John's, NL A1A 5B2
Attention: Board Secretary

TO: Newfoundland & Labrador Hydro
P.O. Box 12400
500 Columbus Drive
St. John's, NL A1B 4K7
Attention: Tracey L. Pennell, Senior Counsel, Regulatory

TO: Dennis Browne, Q.C., Consumer Advocate
Browne Fitzgerald Morgan & Avis
Terrace in the Square
St. John's, NL A1B 4J9

TO: Newfoundland Power Inc.
P.O. Box 8910
55 Kenmount Road
St. John's, NL A1B 3P6
Attention: Gerard Hayes, Senior Legal Counsel

TO: Cox & Palmer
Scotia Centre, Suite 1000
235 Water Street
St. John's, NL A1C 1B6
Attention: Denis Fleming

TO: Olthuis, Kleer, Townshend LLP
229 College Street, 3rd Floor
Toronto, ON M5T 1R4
Attention: Senwung Luk

TO: House of Commons
Confederation Building
Room 682
Ottawa, ON K1A 0A6
Attention: Yvonne Jones, Member of Parliament, Labrador

TO: Benson Buffett
Suite 900, Atlantic Place
P.O. Box 1538, Stn. C.
215 Water Street
St. John's, NL A1C 5N8
Attention: Genevieve M. Dawson

TO: Teck Resources Limited
Duck Pond Operations
P. O. Box 9
Millertown, NL A0H 1V0
Attention: Larry Bartlett