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nalcorenergy.com

October 29, 2019

VIA EMAIL

s. 40(1)

Attention:

[REDACTED]

Dear

[REDACTED]

s. 40(1)

Re: Your request for access to information under Part II of the *Access to Information and Protection of Privacy Act, 2015* (File #: PB/732/2019)

On September 30, 2019, Nalcor Energy received your request for access to the following records/information:

Part 1

Reference PB/637/2019:

Please provide the Planning Load Forecast in MW for each year (broken out separately) included in table 12, on page 295 of NL Hydro's Reliability and Resource Adequacy Study (November 2018 - Revision 1) - Table 12: Labrador Utility Electricity Load Growth Summary - 2018 Planning Load Forecast. Can you please provide for each year from current to 2030 and ensure that the following is included:

- (1) Total Labrador MW demand for the current year.*
- (2) Increase in MW required for Labrador per year, to 2030.*

Part 2

Reference: Synapse Energy Economics Inc. - Phase 2 Report on Muskrat Falls Project Rate Mitigation

See increased Labrador Demand not considered by Nalcor. Can Nalcor comment on the Synapse projected increased Labrador power demand to 2030?

*Page 4 reference: "As reflected in a load duration curve, the need for the highest level of available generation resources occurs over relatively few hours of the year. In short, there is significant headroom for consuming surplus energy, or selling excess energy externally, without undermining the requirement to meet the Province's peak load during the coldest periods of the year. **Careful attention must be paid to peak period load consumption and incentives to lower such peak demand.**"*

Critically, we also assume a need to reduce peak load during winter periods and assign value to all efforts that lead to a reduction in peak load. Thus, peak load reduction associated with demand-side measures attracts a value equal to avoided capacity costs."

*Page 30 reference: "The NLH forecast for Labrador projects relatively flat consumption through 2030, as shown in Table 9. However, the industrial load may change during that time frame. Some new industrial customers have been approved, and there are some potential new ones as well. For the LIS, **the Wabush Mines are being reactivated with loads of 55 MW (peak) and 430 GWh per year. There are other new potential loads of 50 to 165 MW which would represent a significant increase for Labrador. Typically, these industrial loads have high load factors and remain in operation during the winter peak periods. Some, however, participate in demand reduction programs."***

Please see Appendix A attached hereto for the response to part 1 of your request. Please note that there are no records responsive to part 2 of your request.

It is the goal to publish this letter following a 72 hour period after it is sent electronically to you or five business days in the case where the letter has been mailed to you.

Please be advised that you may ask the Information and Privacy Commissioner to review the processing of your access request, as set out in section 42 of the Access to Information and Protection of Privacy Act (*the Act*). A request to the Commissioner must be made in writing within 15 business days of the date of this letter or within a longer period that may be allowed by the Commissioner. Your appeal should identify your concerns with the request and why you are submitting the appeal.

The appeal may be addressed to the Information and Privacy Commissioner as follows:

Office of the Information and Privacy Commissioner

2 Canada Drive

P. O. Box 13004, Stn. A

St. John's, NL. A1B 3V8

Telephone: (709) 729-6309

Toll-Free: 1-877-729-6309

Facsimile: (709) 729-6500

You may also appeal directly to the Supreme Court Trial Division within 15 business days after you receive the decision of the public body, pursuant to section 52 of the Act (a copy of this section of the Act has been enclosed for your reference).

If you have any further questions, please feel free to contact the undersigned by telephone at (709) 733-5346 or by e-mail at granthiscock@nalconenergy.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Grant Hiscock". The signature is stylized with a large initial "G" and a long horizontal stroke.

Grant Hiscock
Access and Privacy Officer

Access or correction complaint

42. (1) A person who makes a request under this Act for access to a record or for correction of personal information may file a complaint with the commissioner respecting a decision, act or failure to act of the head of the public body that relates to the request.

(2) A complaint under subsection (1) shall be filed in writing not later than 15 business days

(a) after the applicant is notified of the decision of the head of the public body, or the date of the act or failure to act; or

(b) after the date the head of the public body is considered to have refused the request under subsection 16(2).

(3) A third party informed under section 19 of a decision of the head of a public body to grant access to a record or part of a record in response to a request may file a complaint with the commissioner respecting that decision.

(4) A complaint under subsection (3) shall be filed in writing not later than 15 business days after the third party is informed of the decision of the head of the public body.

(5) The commissioner may allow a longer time period for the filing of a complaint under this section.

(6) A person or third party who has appealed directly to the Trial Division under subsection 52(1) or 53(1) shall not file a complaint with the commissioner.

(7) The commissioner shall refuse to investigate a complaint where an appeal has been commenced in the Trial Division.

(8) A complaint shall not be filed under this section with respect to

(a) a request that is disregarded under section 21;

(b) a decision respecting an extension of time under section 23;

(c) a variation of a procedure under section 24; or

(d) an estimate of costs or a decision not to waive a cost under section 26.

(9) The commissioner shall provide a copy of the complaint to the head of the public body concerned.

Direct appeal to Trial Division by an applicant

52. (1) Where an applicant has made a request to a public body for access to a record or correction of personal information and has not filed a complaint with the commissioner under section 42, the applicant may appeal the decision, act or failure to act of the head of the public body that relates to the request directly to the Trial Division.

(2) An appeal shall be commenced under subsection (1) not later than 15 business days

(a) after the applicant is notified of the decision of the head of the public body, or the date of the act or failure to act; or

(b) after the date the head of the public body is considered to have refused the request under subsection 16(2).

(3) Where an applicant has filed a complaint with the commissioner under section 42 and the commissioner has refused to investigate the complaint, the applicant may commence an appeal in the Trial Division of the decision, act or failure to act of the head of the public body that relates to the request for access to a record or for correction of personal information.

(4) An appeal shall be commenced under subsection (3) not later than 15 business days after the applicant is notified of the commissioner's refusal under subsection 45(2).

Appendix A: Part 1 Response

Reference PB/637/2019:

Please provide the Planning Load Forecast in MW for each year (broken out separately) included in table 12, on page 295 of NL Hydro's Reliability and Resource Adequacy Study (November 2018 - Revision 1) - Table 12: Labrador Utility Electricity Load Growth Summary - 2018 Planning Load Forecast. Can you please provide for each year from current to 2030 and ensure that the following is included:

- (1) Total Labrador MW demand for the current year.
- (2) Increase in MW required for Labrador per year, to 2030.

Response:

Please see the following tabular information.

Planning Load Forecast for Labrador Interconnected System (LIS) - Base Case											
Coincident Customer Demand Requirements (MW)											
	2019	2020	2021	2022	2023	2024	2025	2026	2027	2028	2029
LIS Peak Demand	392	389	390	390	391	391	392	393	394	394	395
Annual Change	-7	-2	0	0	0	1	1	1	1	1	1
Note:											
1. Peak demands do not include transmission line losses.											
Forecast Preparation Date: July 2018											

Planning Load Forecast for Labrador Interconnected System (LIS) - Alternate Cases											
Coincident Customer Demand Requirements (MW)											
	<u>2019</u>	<u>2020</u>	<u>2021</u>	<u>2022</u>	<u>2023</u>	<u>2024</u>	<u>2025</u>	<u>2026</u>	<u>2027</u>	<u>2028</u>	<u>2029</u>
Case I: Increased requirements at DND											
LIS Peak Demand	392	400	400	401	401	402	403	403	404	405	406
Annual Change	-7	8	0	0	0	1	1	1	1	1	1
Case II: Data Centre Development - East											
LIS Peak Demand	392	403	411	419	419	420	421	421	422	423	424
Annual Change	-7	12	8	8	0	1	1	1	1	1	1
Case III: Data Centre Development - West											
LIS Peak Demand	392	416	430	442	442	443	444	444	445	446	447
Annual Change	-7	25	14	11	0	1	1	1	1	1	1
Case IV: Mine Redevelopment											
LIS Peak Demand	421	428	436	437	437	438	439	439	440	441	442
Annual Change	11	7	8	0	0	1	1	1	1	1	1
Note:											
1. Peak demands do not include transmission line losses.											
Forecast Preparation Date: July 2018											