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nalcorenergy.com

September 24, 2019

VIA EMAIL

s. 40(1)

Attention:

Dear

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Re: Your request for access to information under Part II of the *Access to Information and Protection of Privacy Act, 2015* (File #: PB/633/2019)

On August 26, 2019, Nalcor Energy received your request for access to the following records/information:

Re: PB-540-2019 Has Nalcor studied using wind and small hydro with the 222.9 MW peaking unit capacity to reduce the winter peak? If so, please provide reports or discuss why not. Also, has the Holyrood thermal plant area been studied for wind potential? If so please provide reports.

Aug 25 2019 for public ATIPP can you confirm directly that there are no studies with respect to the BDE/Cat Arm peaking unit capacity (combined with wind and small hydro to reduce the winter peak and save Holyrood fuel with less water spill)?

PB-540-2019:

BDE peaking unit capacity 154.4 MW - \$ 196.9 M ----- Cat Arm peaking unit capacity 68.5 MW - \$132 M Total 222.9 MW - cost \$328 M - could be used to reduce the winter peak, save Holyrood fuel + less water spill.

Adding peaking power to accommodate intermittent power from wind and small run-of-river hydro. When the intermittent power is generating, Bay d'Espoir and Cat Arm power can be scaled back and the saved energy stored in their large reservoirs. The peak capacity at Cat and the Bay can then be substituted when the intermittent energy is not on line.

1/ Has Nalcor studied using wind & small hydro with the 222.9 MW peaking unit capacity to reduce the winter peak -to save Holyrood fuel &reduce summer water spills

2/ a/ re 1/, If so provide reports

b/ if not why not

3/ a/ Has the Holyrood thermal plant area been studied for wind potential?

b If so provide reports

Please note that there are no reports specifically responsive to your request, however, we have provided some information relevant to your questions and have also provided some publically available links to reports that you may be interested in viewing.

Nalcor Energy has looked at different areas throughout the province for potential opportunities for generating wind power, including the Avalon Peninsula, however, there are currently no reports specifically analyzing a potential wind farm at the Holyrood Generating Station. A site was considered at Kelligrews as part of a transmission planning exercise to determine the technical limits of wind integration for the Isolated System in 2012. No wind measurements or wind analyses were undertaken as part of this exercise. This study is publically available and can be found at the following link:

<http://muskratfalls.nalcorenergy.com/wp-content/uploads/2013/03/Report-Wind-Integration-Study-for-Isolated-Island.pdf>

Nalcor Energy routinely completes resource planning exercises that consider all available resources, including wind generation and the capacity that additional units at Bay d'Espoir and Cat Arm can provide. In these analyses, provincial requirements are assessed, and if it is determined that additional resources are needed to meet customer requirements, the least cost option is identified and recommended for the consideration of the Board of Commissioners of Public Utilities and stakeholders. Please note, however, with respect to the statements on water spill, wind is a non-dispatchable resource that primarily provides energy to the system. As such, increasing the wind generation on the Island Interconnected System would result in more non-dispatchable energy on the system, which could actually increase the likelihood of spilled water, rather than decrease this likelihood. Further, interconnection to the North American grid provides for an opportunity to sell energy to the market, thereby reducing the likelihood of spilling energy. In its current operations, NL Hydro minimizes thermal production to the extent possible, consistent with its mandate to provide the lowest cost electricity consistent with reliable service. In the current system, Holyrood is required - its role will be replaced in the future by generation from Muskrat Falls.

Nalcor Energy has studied using wind and small hydro in its previous resource assessments, including the 2012 Generation Planning Issues Report, and the recently filed Reliability and Resource Adequacy Report. Both reports are publically available:

<https://nlhydro.com/wp-content/uploads/2014/11/Generation-Planning-Issues-Report-November-2012-FINAL.pdf>

<http://pub.nl.ca/indexreports/From%20NLH%20%20-%20Reliability%20and%20Resource%20Adequacy%20Study%20-%20November%202018%20-%202018-11-16.PDF>

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 is 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@nalcenergy.com.

Sincerely,

A handwritten signature in blue ink, appearing to read "Grant Hiscock".

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).