2007 NSUARB-P-886

**NOVA SCOTIA UTILITY AND REVIEW BOARD**

**IN THE MATTER OF:** The *Public Utilities Act,* R.S.N.S. 1989, c.380 as amended

**IN THE MATTER OF:** An Application by Nova Scotia Power Incorporated for Approval of Certain Revisions to its Rates, Charges and Regulations

**RESPONSE TO INFORMATION REQUEST**

**TO: NSPI**

**FROM: SEB** **REDACTED**

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**Question IR-1:** **In Section 1.1, it is stated that the fuel forecast for 2007 is $68.5 million higher than the fuel amount currently provided for in rates. Please indicate the actual estimated fuel cost expected for 2006. Please also indicate the figure that equates to "the fuel amount currently provided for in rates".**

**Please indicate the amount by which the coal, petroleum coke, oil and natural gas prices exceeded the original estimate in NSPI's 2006 rate application filing on a commodity by commodity basis.**

**Response IR-1:** Please refer to UARB IR-4.

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**FROM: SEB**

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**Question IR-2:** **Please provide a breakdown of the increase in solid fuel costs from 2006 to 2007 by:**

**a. petroleum coke;**
**b. low sulphur coal;**
**c. medium sulphur coal;**
**d. high sulphur coal.**

**Please also indicate which portion of the increase for each solid fuel is on account of the removal of the 2006 coal disallowance and/or an increase in the price of the commodity.**

**Response IR-2:** Please refer to UARB IR-4 Attachments 5 through 10 for an analysis of the forecasted solid fuel costs in 2007 versus 2006C. The 2006C import coal disallowance of $15.7 million was arbitrarily allocated to the delivered price of the 2006F import coal costs. Please also refer to Avon IR-51.

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**TO: NSPI**

**FROM: SEB** **REDACTED**

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**Question IR-3:** **Please provide the primary contractual terms anticipated for the new domestic coal contract: price, term, quantities, quality, optional quantities, etc.**

**Response IR-3:** This information is available for viewing at NSPI offices. Please refer to Liberty IR-14.

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**RESPONSE TO INFORMATION REQUEST**

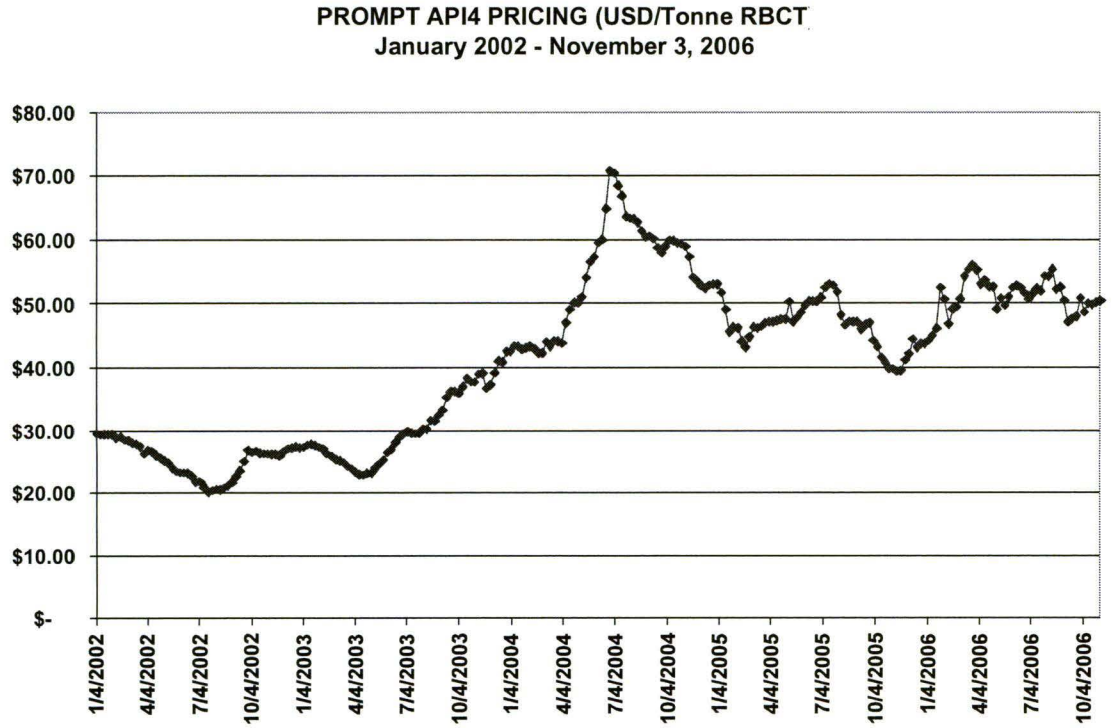
**TO: NSPI**

**FROM: SEB**

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**Question IR-4:** **In Figure 2.3.4 there is a plot of API 2 pricing. Please provide a similar Figure for the same time period for API 4 pricing.**

**Response IR-4:** Please refer to the graph below.



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**RESPONSE TO INFORMATION REQUEST**

**TO: NSPI**

**FROM: SEB** **REDACTED**

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**Question IR-5:** **In Figure 2.10 and on page 59 NSPI shows a price for uncommitted volumes of petroleum coke at [redacted] Canadian. Please explain in detail the assumptions that have been made to support this forecast price. In answering this Information Request, please provide more specific detail than is set out at pages 21 through 24 of the Application.**

**Response IR-5:** The price for uncommitted volumes of petroleum coke at [redacted] is based on:

1. Current petroleum coke pricing
2. Pricing at which NSPI would consume high sulphur coal rather than petroleum coke
3. Marine freight pricing to transport petroleum coke to Nova Scotia
4. Exchange Rate

As published in the August PACE Petroleum Coke Quarterly, the average of the high and low pricing for [redacted] for the month of July was [redacted].

[redacted]

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**Response IR-5:** (cont'd)

The average of the high and low prices for [redacted] from [redacted] was [redacted]

Using the forecast pricing for the uncommitted mid sulphur coal volumes [redacted], the FOB petroleum coke price at which NSPI would switch from petroleum coke to mid sulfur coal would be [redacted]

These two price points were used to determine the FOB US Gulf price at which NSPI would buy petroleum coke. Whereas petroleum coke is typically purchased on a delivered basis, a marine freight rate of [redacted] was applied to the FOB price.

The delivered Nova Scotia price of the uncommitted petroleum coke volumes is [redacted]. The exchange rate used is [redacted].

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**Question IR-6:** **For Figure 2.3.9 please explain why a start date of January 2000 was chosen.**

**Response IR-6:** January 2000 was the start date for the four figures that contained trendlines not just Figure 2.3.9. Given some start date was needed, the beginning of the decade seemed appropriate.

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**TO: NSPI**

**FROM: SEB** **REDACTED**

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**Question IR-7:** **At page 23, it is stated that:**

**"The major factor influencing pet coke pricing in 2007 is weather (more specifically hurricanes)."**

**Since the hurricane season so far in 2006 has been less severe than predicted, does EVA expect to see a lower petroleum coke price than currently forecast?**

**Response IR-7:** As shown in the updated 2.3.9 (Please refer to Liberty IR-63), petroleum coke prices have stayed high through September despite the fact that there were no major hurricanes in 2006. Explanations are strong European demand, residual affects from the 2005 hurricanes, and continued concerns about the possibility for hurricanes in 2006.

Now that the hurricane season has effectively ended (it officially ends at the end of November), petroleum coke prices could soften but such softening would have limited impact on NSPI's 2007 budget for three reasons.

1. [redacted]

2. [redacted].

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**Response IR-7:** (cont'd)

3. [redacted]

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**Question IR-8:** **For Figure 2.3.10 please explain why January 2000 was chosen for the start date for this graph.**

**Response IR-8:** Please refer to SEB IR-6.

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**TO: NSPI**

**FROM: SEB** **REDACTED**

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**Question IR-9:** **Please provide a chart showing NSPI's solid fuels procurement team, detailing the length of time each member has been involved in fuel procurement either with NSPI or another company, specifically indicating any experience with other companies.**

**Response IR-9:** Please see the Confidential Attachment 1 outlining NSPI's solid fuel procurement teams' experience.

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**FROM: SEB**

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**Question IR-10:** **On page 36 starting at line 1, it is indicated that "one coal company" has certain credit term clauses in its agreement. Does this coal company actually currently supply NSPI? If so, does NSPI's contract with this coal company have these terms?**

**Response IR-10:** No.

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**Question IR-11:** **With respect to Figure 2.3, please provide copies of all contracts for coal, pet coke and freight which make up the contracted solid fuel referenced in Figure 2.3.**

**Response IR-11:** This confidential information is available for viewing at NSPI offices. Please refer to Liberty IR-14 and Liberty IR-15.

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**TO: NSPI**

**FROM: SEB** **REDACTED**

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**Question IR-12:** **With respect to Figure 2.4, do any of the listed tonnages assume any use of options either upwards or downwards. If so, please identify in specific detail the breakdown between the contracted tonnage and the optional tonnage, and full particulars of all options. Please indicate any options exercised for 2007 deliveries and the particulars of the exercised option.**

**Response IR-12:** In Figure 2.4, some of the listed tonnages assume use of options both upwards and downwards:

[redacted]

[redacted]

[redacted]

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**Response IR-12:** (cont'd)

[redacted]

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**FROM: SEB** **REDACTED**

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**Question IR-13:** **With respect to pages 47 and 48, please explain in detail (on a case by case basis) the basis upon which** [redacted]

**Response IR-13:** Please refer to Avon IR-22.

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**Question IR-14:** **With reference to page 50, please provide a schedule of the vessels discharged at Point Tupper by vessel type and coal type in 2006. Please specifically quantify any savings achieved by the use of the Point Tupper Marine Terminal in 2006, indicating the specific savings and why it was achieved.**

**Response IR-14:** Please refer to Avon IR-24 and Avon IR-66.

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**Question IR-15:** **With reference to the consensus forecast referred to on page 57, please detail the different forecasts that have been used in producing the coal and pet coke price estimates for 2007, giving particulars of each forecast utilized.**

**Response IR-15:** Please refer to Liberty IR-64.

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**TO:** **NSPI**

**FROM:** **SEB** **REDACTED**

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**Question IR-16:** **With reference to Figure 2.11 on page 58, please explain** [redacted]

**Response IR-16:** The increase in high sulphur coal usage in 2007 compared with 2006 is a function of the high price of petroleum coke.

Petroleum coke has traditionally been an inexpensive fuel source. However, as a result of market factors, predominantly the 2005 hurricane season, the petroleum coke market has achieved and sustained all-time pricing highs. At these relatively high price levels, comparative economics indicate that high sulphur coal is an economic alternative to petroleum coke.

The source of this high sulphur coal is [redacted]

The source of petroleum coke is traditionally U.S. Gulf refineries, although some petcoke can be sourced through refineries located on the Great Lakes.

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**Question IR-17:** **With reference to NSPI's use of forward contracts to hedge US Dollar requirements for fuel (page 61) please describe all hedging mechanisms that NSPI uses to cover fuel price in addition to foreign exchange risk, if any?**

**Response IR-17:** Please refer to Liberty IR-3.

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**FROM: SEB** **REDACTED**

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**Question IR-18:** **On page 33, line 4, it is stated that:**

**"NSPI has been able to arbitrage portions of its commitments with favourable results."**

**Please provide particulars of what NSPI has done in this regard, including quantification of the favourable results.**

**Response IR-18:** In 2005, NSPI had [redacted] tonnes from [redacted] coal [redacted] per tonne [redacted]. In 2006, NSPI was able to convert on a Btu basis the unshipped tonnages for [redacted] NSPI prefers the [redacted] coal because it is a better blending stock, reduces handling costs, improves boiler efficiency, and has more market value should additional arbitrage opportunities be available. NSPI estimated the trade had a [redacted]

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**Question IR-19:** **Please explain the manner in which NSPI covers exchange rate risk for their long and medium term solid fuel and shipping contracts. (For example, does NSPI cover dollar requirements on an individual contract basis and if so, what percentage of the contract or tonnage does NSPI cover and for how far ahead?)**

**Response IR-19:** Please refer to CME IR-16.

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**Question IR-20:** **Please provide the workpapers supporting the calculation/derivation of the** [redacted]

**Response IR-20:** Please refer to UARB IR-4 Attachment 11.

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**FROM: SEB** **REDACTED**

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**Question IR-21:** **Please provide a complete copy of the [redacted] that was stipulated to during the previous rate case, including all appendices and pricing schedule.**

**Response IR-21:** This confidential information is available for viewing at NSPI offices. Please refer to Liberty IR-15.

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**TO: NSPI**

**FROM: SEB** **REDACTED**

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**Question IR-22:** **Please provide the volumes and prices that NSPI is forecasting for purchases under the [redacted] for each month of 2007, differentiated [redacted].**

**Response IR-22:** The response to this question is confidential.

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**Question IR-23:** **Please provide the volumes and prices that NSPI has purchased under** [redacted]

**Response IR-23:** Please refer to Confidential Attachment 1.

[redacted].

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**Question IR-24:** **Please provide the forecasted** [redacted]

**Response IR-24:** Please refer to Liberty IR-43 Attachment 14 for the forward pricing data as of July 31, 2006, which is the forward curve date NSPI used to produce the 2007 forecast natural gas prices.

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**Question IR-25:** **Please explain and reconcile the apparent difference between the monthly HFO and Natural Gas prices shown in Figure 2.6 and the seemingly lower prices for these fuels that are shown in Figure 2.7 and Figure 2.9.**

**Response IR-25:** Figure 2.6 illustrates the forecasted monthly market price of Heavy Fuel Oil (HFO), natural gas and Light Fuel Oil (LFO) delivered to Tufts Cove Generating Station for 2007. These prices do not consider the effect of inventories or contract pricing. They are derived only from the forward curve for each month, for both 2006C and 2007.

Figure 2.7 is the annual forecasted consumed price of HFO. This price takes into account the following information:

- The forward market prices as described above;
- Opening inventories;
- Mark-to-market of financial hedges;
- Contract pricing;
- Forecasted consumption volumes and prices including Tufts Cove, Tufts Cove 4 & 5 and the solid fuel generating plants.

Please refer to Liberty IR-43 Attachment 2 for the detailed calculations of the 2006C HFO price as depicted in Figure 2.7. Refer to Liberty IR-43 Attachment 3 for the detailed calculations of the 2007 HFO price as depicted in Figure 2.7.

Figure 2.9 is the annual forecasted consumed price of natural gas to both Tufts Cove and Tufts Cove 4 & 5 for 2006C and 2007. The pricing is based on the forecasted delivered price of natural gas under contract.

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**Response IR-25:** (cont'd)

Please refer to Liberty IR-43 Attachment 5 for the detailed calculation to support the 2006C forecasted price of natural gas as depicted in 2.9. Please refer to Liberty IR-43 Attachment 6 and Attachment 7 for the calculation to support the 2007 forecasted price of natural gas depicted in Figure 2.9.

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**FROM: SEB** **REDACTED**

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**Question IR-26:** **There seems to be a discrepancy concerning the open or uncommitted tonnes of low sulfur coal for 2007 between [redacted]. Please explain and reconcile the difference. If there is no discrepancy, please explain why not?**

**Response IR-26:** The response to this question is confidential.

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**FROM: SEB** **REDACTED**

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**Question IR-27:** **Please provide a version of Figure 2.10 using committed (instead of uncommitted) volumes and (weighted average) prices for 2007, on an apples to apples basis.**

**Response IR-27:** Please see Confidential Attachment 1.

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**FROM: SEB** **REDACTED**

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**Question IR-28:** **Please provide a version of Figure 2.10 using committed (instead of uncommitted) volumes and (weighted average) prices for 2008, on an apples to apples basis.**

**Response IR-28:** Please see Confidential Attachment 1.

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**FROM: SEB** **REDACTED**

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**Question IR-29:** **On page 57 the evidence states that Figure 2.10 is representative of various perspectives and is a consensus forecast. Please provide the minimum and maximum prices for each type of solid fuel that form the basis for this consensus forecast.**

**Response IR-29:** Please see Confidential Attachment 1.