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April 9, 2018

The Board of Commissioners of Public Utilities
Ms. G. Cheryl Blundon, Board Secretary
Prince Charles Building
210 - 120 Torbay Road,
St. John's, NL, A1A 2G8

Re: Rate Mitigation Reference – Labrador Interconnected Group Comments on Phase 2 Scope

Dear Ms Blundon,

The Labrador Interconnected Group (“LIG”) consists of the Towns of Labrador City, Wabush, Happy Valley-Goose Bay, and Sheshatshiu Innu First Nation. All are communities on the Labrador Interconnected System. We are pleased to provide comments on the Draft Issues To Be Reviewed that was circulated by the Board by correspondence dated April 3, 2019.

With respect to the Draft Issues, the LIG wishes to state generally that an analytical model which considers the Island separately from Labrador would allow for a more fine grained analysis of potential cost savings. Such an analysis would more accurately reflect current service patterns and would allow for a more realistic appraisal of different cost saving options.

We also understand that based on the application of OC2013-342 and OC2013-343, the Board may take the view that the preponderance of costs issues in this proceeding may not be relevant to the LIG. As such, the LIG have not been permitted to access certain confidential information pertaining to Muskrat Falls Project costs. Based on the above, the LIG has no objection at this time but will continue to monitor this proceeding should unforeseen issues arise.

Should you have any questions, please be sure to contact me.

Respectfully,
Olthuis, Kloor, Townshend LLP
PER:

A handwritten signature in black ink, appearing to read 'Senwung Luk', written in a cursive style.

SEWUNG LUK
PARTNER

SL/tw