

1 Q. **Re: IN-NLH-252**

2 The response provided is non-responsive to the specific Request for Information,
3 which requested that Hydro explain “to what extent and at what level of detail
4 Hydro is able to distinguish between investments in Lab East and Lab West”. Please
5 explain to what extent and at what level of detail Hydro is able to distinguish
6 between investments in Lab East and Lab West.

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9 A. Hydro can distinguish some specific capital projects costs such as “Voltage
10 Conversion – Labrador City”, which clearly indicates Labrador West. However, not
11 all investments have assigned areas or easily distinguishable areas. For example,
12 distribution poles and meters that are purchased in bulk and could be installed in
13 multiple areas.

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15 As stated in Hydro's response to IN-NLH-252, Board Order No. P.U. 14(2004)
16 ordered that there will be a single Cost of Service study for the Labrador
17 Interconnected System. Therefore, Hydro does not track its detailed plant records
18 on a basis that would provide information separately for Lab East and Lab West.