

DELIVERED BY HAND

June 26, 2015

Board of Commissioners
of Public Utilities
P.O. Box 21040
120 Torbay Road
St. John's, NL A1A 5B2

Attention: G. Cheryl Blundon
Director of Corporate Services
and Board Secretary

Ladies and Gentlemen:

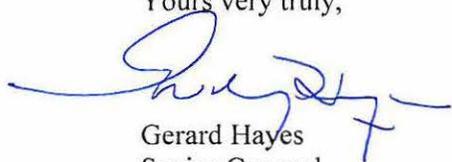
**Re: Newfoundland and Labrador Hydro's 2013 Amended General Rate Application –
Requests for Information**

Please find enclosed the original and 12 copies of Newfoundland Power's Requests for Information NP-IN-4 to NP-IN-8 with respect to the pre-filed evidence of Mr. Philip Raphals.

For convenience, the Requests for Information are provided on three-hole punched paper.

If you have any questions regarding the enclosed, please contact the undersigned at your convenience.

Yours very truly,



Gerard Hayes
Senior Counsel

Enclosures

c. Geoffrey Young
Newfoundland and Labrador Hydro

Paul Coxworthy
Stewart McKelvey

Ed Hearn, QC / Dennis Browne, QC
Miller & Hearn

Nancy Kleer
Olthuis, Kleer, Townshend LLP

Thomas Johnson, QC
O'Dea Earle Law Offices

Thomas O'Reilly, QC
Vale Newfoundland and Labrador Limited

Yvonne Jones, MP
Labrador

Genevieve Dawson
Nunatsiavut Government

IN THE MATTER OF the Public
Utilities Act, R.S.N. 1990, Chapter P-47
(the Act), and

IN THE MATTER OF a General Rate Application
(the Amended Application) by Newfoundland and
Labrador Hydro for approvals of, under Sections 70
and 75 of the Act, changes in the rates to be charged
for the supply of power and energy to Newfoundland
Power, Rural Customers and Industrial Customers; and
under Section 71 of the Act, changes in the Rules and
Regulations applicable to the supply of electricity to
Rural Customers.

**Requests for Information by
Newfoundland Power Inc.**

To: Mr. Philip Raphals

NP-IN-004 to NP-IN-008

June 26, 2015

Requests for Information

- NP-IN-004 [Response to Request for Information NP-NLH-402]
- Hydro has stated that the marginal costs of supply for the Labrador interconnected system will be similar to the marginal costs of supply for the Island interconnected system once the Labrador-Island interconnection is complete. Does Mr. Raphals agree with Hydro's assessment? Please explain your reasoning in detail.
- NP-IN-005 Does Mr. Raphals believe that interconnected system customers located closer to Holyrood should pay higher rates than customers located next to a hydraulic power source? Please explain your reasoning in detail.
- NP-IN-006 Does Mr. Raphals believe that rational people can hold different but valid opinions on fairness? Please explain.
- NP-IN-007 Since the existence or the amount of the rural deficit cannot be attributed to the electricity use of electricity consumers responsible for funding it, does Mr. Raphals agree or disagree that the Board could take considerations such as conservation, efficient use, marginal costs or public policy into account in determining the appropriate deficit allocation methodology? Please explain.
- NP-IN-008 Does Mr. Raphals believe that allocation of the rural deficit must necessarily be somewhat arbitrary? Please explain.

RESPECTFULLY SUBMITTED at St. John's, Newfoundland and Labrador, this 26th day of June, 2015.



NEWFOUNDLAND POWER INC.

P.O. Box 8910

55 Kenmount Road

St. John's, Newfoundland A1B 3P6

Telephone: (709) 737-5609

Telecopier: (709) 737-2974