



Newfoundland Power Inc.

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DELIVERED BY HAND

June 19, 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-LWHN-2 to NP-LWHN-8 with respect to the pre-filed evidence of Dr. James P. Feehan.

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 Kler
Olthuis, Kler, 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 Application) by Newfoundland and Labrador Hydro
for approvals of, under Section 70 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: Dr. James P. Feehan

NP-LWHN-002 to NP-LWHN-008

June 19, 2015

Requests for Information

- NP-LWHN-002 [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 Dr. Feehan agree with Hydro's assessment? Please explain your reasoning in detail.
- NP- LWHN -003 Does Dr. Feehan 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- LWHN -004 Does Dr. Feehan believe that rational people can hold different but valid opinions on fairness? Please explain.
- NP- LWHN -005 Does Dr. Feehan believe that the Board ought to base rates on temperature or weather in various parts of the province? Please explain.
- NP- LWHN -006 Does Dr. Feehan believe that allocation of the rural deficit must necessarily be somewhat arbitrary? Please explain.
- NP- LWHN -007 Does Dr. Feehan believe it is not appropriate for the Board to consider efficient pricing in relation to the allocation of the rural deficit? Please explain.
- NP- LWHN -008 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 Dr. Feehan 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.

RESPECTFULLY SUBMITTED at St. John's, Newfoundland and Labrador, this 19th day of June, 2015.



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