

January 28, 2015

The Board of Commissioners of Public Utilities
Prince Charles Building
120 Torbay Road, P.O. Box 21040
St. John's, Newfoundland & Labrador
A1A 5B2

Attention: Ms. Cheryl Blundon
Director Corporate Services & Board Secretary

Dear Ms. Blundon:

Re: Newfoundland and Labrador Hydro's 2013 AMENDED General Rate Application

In advance of the Counsel meeting set for Friday, January 30, 2015 and to assist with the discussion, Newfoundland and Labrador Hydro (Hydro) submits the following proposals for the General Rate Application (GRA) record and GRA schedule for consideration. Hydro is circulating these proposals to the Board and all the parties for discussion purposes only and recognizes that the draft schedule may need to be adjusted to reflect the Board's future and administrative schedule. Hydro hopes that by circulating the draft schedule in advance of the Counsel meeting, that this will help to expedite the process.

GRA RECORD PROPOSAL

Hydro proposes that the record for the 2013 GRA (as Amended) consist of the most recent versions filed of any of the documentation, and where no revisions have been filed, the original version of documentation.

Hydro will provide a Table of Concordance with respect to the Requests for Information (RFI) responses it has submitted, referencing the most recent versions of each response. Should any further revisions/new RFI responses be filed by Hydro, this Table of Concordance will be updated by Hydro and recirculated to the parties following any new filings. The Table of Concordance is further explained below under "Aides to Review".

Earlier versions of revised documentation in the record would therefore be considered expunged from the record for this proceeding. Thus, earlier versions of RFIs (for which revisions have been filed) and the original filed version of the GRA Application (Volumes 1 and 2) would no longer be considered as part of the record of this GRA. With respect to expert evidence, Hydro proposes that the original expert report and any updates that are filed form part of the record. If a party choses to file an amended expert report to replace the earlier report, then the original report would be considered expunged from the record and the amended expert report would stand as the version on record.

The objective of this proposal is to both clarify the record so that stale and no longer relevant materials are identified and therefore excluded and to generally reduce the volume of the documentation that forms the record for the Amended GRA application. This should reduce the administrative and hearing burden on all. Hydro proposes that parties wishing to include any of the expunged materials may do so by written request to the Board at any time prior to the Public Hearing. It is unlikely that Hydro would contest any such submission.

AIDES TO REVIEW

Where helpful or necessarily to expedite the process, Hydro will provide a Table of Concordance to the parties to reconcile references in the RFIs between the original and Amended Application to assist in navigating the record. This document will be not considered part of the record, but will simply provide access points to the record for the parties.

Table of Concordance

A sample of the proposed headings for the Table of Concordance is shown below. This Table can be amended as needed to accommodate the needs of the Board or other parties and will be maintained and circulated to the parties following any new filings by Hydro. For clarification, the third column "Part" refers to RFIs that asked multiple questions, ex. CA-NLH-095 which contained three questions, an "a", "b" and "c". Hydro also recognizes that some RFIs were revised prior to the filing of the Amended Application and as such, has added a column to distinguish between those RFIs that were revised prior to the filing of the Amended Application and those that were revised as a result of the Amended Application. Hydro is actively working on the Table of Concordance but does not consider it necessary to have the reference document completed prior to proceeding with the RFI process.

Party	RFI #	Part	Rev #	Revised as a result of Amended Application (Y/N)	Question	Original Reference	New Reference	Link to most Recent Response	Issue
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Issue List

The Table of Concordance noted above can also include an Issue heading. Rather than a unilateral classification of issues, Hydro proposes to classify the RFIs according to the Issues List circulated by the Board on June 9, 2014. This would be a preliminary, informal Issues List that would not be binding on the parties. If deemed necessary, the parties and the Board could each submit their own "preliminary" Issues List. Hydro will then undertake a classification of the RFIs with this consolidated list for circulation to the Board and parties. Hydro submits that having a classification column to separate the RFIs by issue will be more helpful for all. This Issue List could also be modified once the final Issues List is determined.

Other Assistance

Hydro is prepared to provide other assistance (verbal or written) as may be reasonably necessary to assist the Board and other parties in navigating the record in advance of the Public Hearing.

GRA SCHEDULE PROPOSAL

Hydro's proposed Schedule for the GRA for discussion purposes is attached as Appendix A.

Should you have any questions, please contact the undersigned.

Yours truly,

NEWFOUNDLAND AND LABRADOR HYDRO



Tracey L. Rennell
Legal Counsel

TLP/jc

cc: Gerard Hayes – Newfoundland Power
Paul Coxworthy – Stewart McKelvey Stirling Scales
Thomas J. O'Reilly, Q.C. – Cox & Palmer
Senwung Luk – Olthuis, Kleer, Townshend LLP

Thomas Johnson – Consumer Advocate
Yvonne Jones, MP Labrador
Ed Hearn, Q.C. – Miller & Hearn
Genevieve M. Dawson – Benson Buffett

Appendix A

**Hydro Proposed Amended GRA Timetable – For Discussion
 (Based on originally approved steps from 2014 GRA Schedule as issued by the Board)
 Draft Date: January 28, 2015**

Suggested Date for Purposes of Discussion	Proposed Step (please note that some steps may/should run concurrently)
On or before Friday, February 13, 2015	RFIs filed (consistent with PUB Counsel’s estimate of requiring three weeks as stated at the meeting of Counsel on January 19, 2015)
Friday, March 13, 2015	Responses to RFIs by NLH
Friday, March 27, 2015	Amendments to experts’ reports and Pre-filed evidence filed by other parties, including Board’s Financial Consultant (if required)
Thursday, April 2, 2015	NLH RFIs on experts’ reports (if necessary)
Friday, April 17, 2015	Responses by parties to RFIs on experts reports
Wednesday, April 22, 2015	Filing of issues for settlement conference
Wednesday, April 29, 2015	Negotiation period commences
Wednesday, May 13, 2015	Filing of settlement agreement, issues list, witness list, and proposed order of witnesses, motions day, if required
Wednesday, May 20, 2015	Final deadline for filing any outstanding information
Tuesday, May 26, 2015	Public hearing begins

Hydro schedule assumptions:

- *Motions Day would not be required or issues requiring a motion may be dealt with by paper proceeding with the Board and parties.*
- *Reply Evidence by Hydro may not be required but if necessary, could be filed during the negotiation period.*