

April 13, 2015

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Via Electronic Mail and Courier

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

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

Dear Ms. Blundon:

**Re: Island Industrial Customer Submissions on NP's 20 March Application re Outage
Inquiry-- Phase II-RFIs (NP-NLH 004, 005, 018)**

We write on behalf of the Island Industrial Customers, Corner Brook Pulp and Paper Limited, North Atlantic Refining Limited, and Teck Resources Limited.

We are responding to the Board's invitation to the Intervenors to make comments in relation to the above Application of Newfoundland Power. By the Application, Newfoundland Power is seeking that Hydro provide full and adequate responses to Requests for Information numbers NP-NLH-004, NP-NLH-005 and NP-NLH-018.

The Island Industrial Customers note that by Order No. P.U. 3 (2014), the Board ordered that the issues to be considered in Phase II of the Board's investigation and hearing into Supply Issues and Power Outages were to include, amongst other things, evaluation of the adequacy and reliability of the Island Interconnected system up to and after the interconnection with the Muskrat Falls generating facility.

It appears that the information sought by Newfoundland Power by the above-noted Requests for Information concerns the design of the Labrador-Island HVdc transmission system. Specifically, it appears from the Affidavit of Mr. Elias Ghannoum, the consultant retained by Newfoundland Power, filed in support of the above Application that the information being sought by Newfoundland Power exists, or should exist, in relation to the mathematical calculations and design specifications which would be typically prepared for a system such as the Labrador-Island HVdc transmission system. In that regard, it does not appear that it would be onerous to require Hydro to provide this information.

The Board in its Order No. P.U. 41 (2014) stated that:

"Although an evaluation of the Muskrat Falls Project is not part of this proceeding, the Board believes that information which goes to the risks of timely delivery of reliable and adequate power to the Island Interconnected System is relevant to the issues in this proceeding and should be produced."

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As indicated by the Board in the same Order, and as specifically noted by Newfoundland Power in its Application:

"Each request for information must be considered in all of the circumstances balancing the interest of full disclosure and participation with an efficient process and the potential for undue burden on the parties."

In the view of the Island Industrial Customers, the information being sought by Newfoundland Power relates to the reasonable evaluation of the adequacy and reliability of the Island Interconnected System, after interconnection with the Muskrat Falls generating facility, and as such falls within the Board ordered scope for Phase II of this proceeding. Moreover, it appears, based on the evidence filed by Newfoundland Power, that there would not be an undue burden placed on Hydro in providing the information sought by Newfoundland Power pursuant to the above-noted Requests for Information. Therefore, the Island Industrial Customers would support Newfoundland Power's Application.

We thank you for the opportunity to provide these comments on the above Application.

We trust you will find the above to be in order.

Yours truly,

Stewart McKelvey

A handwritten signature in black ink, appearing to read 'Paul L. Coxworthy', with a long horizontal flourish extending to the right.

Paul L. Coxworthy

PLC/kmcd

- c. Geoffrey P. Young, Senior Legal Counsel, Newfoundland and Labrador Hydro
Thomas J. Johnson, Consumer Advocate
Gerard Hayes, Newfoundland Power
Ian F. Kelly Q.C., Curtis, Dawe
Dean A. Porter, Poole Althouse
Danny Dumaresque
Roberta Frampton Benefiel, Grand Riverkeeper Labrador Inc.