

IN THE MATTER OF An Investigation And Hearing  
Into Supply Issues And Power Outages On The  
Island Interconnected System.

**REQUEST FOR SETTING A FILING DATE FOR RESPONSES CALLED FOR BY P.U.41(2014)**

**Board of Commissioners of Public Utilities  
Prince Charles Building  
120 Torbay Road, P.O. Box 21040  
St. John's, NL  
A1A 562**

**ATTENTION: Ms. Cheryl Blundon  
Director of Corporate Services & Board Secretary**

**November 24, 2014**

Dear Ms. Blundon,

On July 2, 2014, Grand Riverkeeper Labrador Inc.(GRK) filed RFIs GRK-NLH-1 through -52. On July 7, NLH filed a Notice of Motion with regard to some of these RFIs.

GRK filed an additional five (5) RFIs in its submission of August 26, later renumbered as GRK-NLH-53 through -57.

Over four months later, on Oct. 16, 2014, the Board issued Order P.U.41 (2014), in which it accepted Hydro's Motion in part and rejected it in part, ordering NLH to respond to GRK's RFIs number GRK-NLH-21, -22, -24 through -26, -43 through -46, -55, and -57 (the "P.U.41 RFIs"). On page 28 of this Order, it is stated that the Board will set the schedule for responding to these RFIs by separate letter. Today, five (5) weeks after the issuance of P.U.41(2014), no such schedule has been announced.

The absence of responses to these RFIs, filed last July, represents a significant impediment to GRK's preparation for these hearings. GRK respectfully requests that the Board promptly issue a schedule for responding to these RFIs, as stated in P.U. 41 (2014). It further requests that delays for these responses be short, as Hydro has already had five (5) weeks to prepare its responses.

Subsequently, on September 28, 2014, GRK has also issued RFIs GRK-NLH-58 through -75 (the "Supplemental RFIs"). (One of these, GRK-NLH-63, is contested by NLH.) GRK respectfully submits that, together with the schedule for responses to the P.U. 41 RFIs, it would be appropriate for the Board to also issue a schedule for the responses to GRK-NLH-58 through -75 (including, or not, GRK-NLH-63, depending on the Board's decision in this matter).

Finally, you recently requested comment on a proposed deadline of December 1 for Round 1 RFIs for Phase Two of this proceeding.

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For all other parties, these "Round 1" RFIs are subsequent to the responses to the RFI round held in July and afterwards. GRK respectfully submits that, if required to submit these "Round 1" RFIs before obtaining responses to the P.U. 41 RFIs and the Supplemental RFIs, it would in effect be denied equal treatment to the other participants in the present hearing, which would clearly be unfair.

GRK therefore respectfully requests that the filing date for its Round 1 RFIs for Phase Two of the hearing (currently proposed to be Dec. 1) should be fixed at ten (10) days after the responses to the P.U. 41 RFIs and the Supplemental RFIs are filed.

Respectfully yours,

(s)

Charles O'Brien