

September 8, 2025

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Via Electronic Mail

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

Attention: Ms. Jo-Anne Galarneau, Executive Director and Board Secretary

Dear Ms. Galarneau:

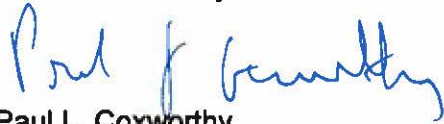
Re: Newfoundland and Labrador Hydro – 2026 Capital Budget Application

Enclosed please find the Island Industrial Customers Group Requests for Information IIC-NLH-001 to 005 dated September 8, 2025 in relation to the above noted Application.

We trust this is in order.

Yours truly,

Stewart McKelvey



Paul L. Coxworthy

PLC/tas

Enclosures

ecc. Board of Commissioners of Public Utilities
Jo-Anne Galameau
Newfoundland and Labrador Hydro
Shirley Walsh
Newfoundland Power
Dominic Foley
Consumer Advocate
Dennis Browne, K.C., Brown Fitzgerald Morgan & Avis
Labrador Interconnected Group
Senwung Luk, Olthuis Kleer Townshend LLP
Nicholas E. Kennedy, Olthuis Kleer Townshend LLP

IN THE MATTER OF the *Public Utilities Act*,
RSNL 1990, c P-47 (the "Act"); and

IN THE MATTER OF an Application
by Newfoundland and Labrador
Hydro ("Hydro") for approval of (i)
its capital budget for 2026, pursuant
to Section 41(1) of the Act, (ii) its
proposed capital purchases and
construction projects for 2026 in
excess of \$750,000, pursuant to
Section 41(3)(a) of the Act, (iii)
contributions by certain Customers
for contribution towards the cost of
improvements to certain property,
pursuant to Section 41(5) of the
Act; and (iv) for an Order, pursuant
to Section 78 of the Act, fixing and
determining its average rate base
for 2024 ("Application").

**REQUESTS FOR INFORMATION OF THE
ISLAND INDUSTRIAL CUSTOMER GROUP**

IC-NLH-001 – IC-NLH-005

ISSUED September 8, 2025

IC-NLH-001 **Schedule 1, 2025 Capital Budget Overview, page 38, Table 10:
Specifically Assigned Capital Work**

Please confirm that Table 10 presents all capital expenditures sought by
Hydro to be approved in this Application and which it is proposed be
specifically assigned to any member of the Island Industrial Customer
Group (Braya Renewable Fuels (Newfoundland) LP, Corner Brook Pulp &
Paper Limited or Vale Newfoundland and Labrador Limited).

IC-NLH-002 **Schedule 1, 2025 Capital Budget Overview, page 38, Table 10:
Specifically Assigned Capital Work**

Please confirm that Table 10 accurately and completely presents the total
cost contributions for the period 2026-2030, presently planned or under
consideration, for which approval will be sought, in the present Application

1 or future applications, to be specifically assigned to any member of the
2 Island Industrial Customer Group (Braya Renewable Fuels
3 (Newfoundland) LP, Corner Brook Pulp & Paper Limited or Vale
4 Newfoundland and Labrador Limited.

5
6 IC-NLH-003 At this time, is Hydro aware of any other new projects within or outside its
7 Five-Year Capital Plan that are under presently consideration, costs of
8 which may be proposed to be specifically assigned to any member of the
9 Island Industrial Customer Group (Braya Renewable Fuels
10 (Newfoundland) LP, Corner Brook Pulp & Paper Limited or Vale
11 Newfoundland and Labrador Limited)?

12 IC-NLH-004 In response to IC-NLH-002 in the Hydro 2025 Capital Budget Application,
13 Hydro stated as follows:

14 *"At this time, Newfoundland and Labrador Hydro can confirm that, to the*
15 *best of its knowledge, Table 9 accurately and completely presents the*
16 *total remaining cost contribution for the period 2025-2029 to be sought*
17 *from Braya Renewable Fuels [Newfoundland] LP in relation to specifically*
18 *assigned capital expenditures."*

19 Table 9 of the Hydro 2025 Capital Budget Application appeared to indicate
20 that there would be no "Beyond 2025" specifically assigned costs to
21 Braya in relation to the "Replace Protective Relays Program"
22 (Transformers T1 and T2). However, the present Application proposes to
23 specifically assign to Braya what appears to be an additional ("Beyond
24 2025") \$412,200 in capital costs for the same Program, in relation to the
25 same transformers. Please fully explain this additional expenditure
26 proposed to be assigned to Braya, in light of Hydro's above-noted
27 response to IC-NLH-002.

28 IC-NLH-005 By IC-NLH-004 in the Hydro 2025 Capital Budget Application, it was
29 submitted on behalf of Braya that it is reasonable, where substantial
30 capital expenditures are made over a short period of time (less than 5
31 years) and proposed to be assigned to an Industrial Customer, that there
32 should be a mechanism to mitigate the year over year contributions to be
33 paid by the Hydro customer to which these expenditures are specifically
34 assigned. In its response to IC-NLH-004, Hydro stated:


35 *"...Hydro must apply to the...Board, pursuant to section 41(5) of the*
36 *Public Utilities Act, prior to making a demand for contributions from its*
37 *customers...towards the cost of improvements or additions to its property.*
38 *If the Board approves the proposed contributions, Hydro can work with the*
39 *customer to ensure the collection of that contribution is reasonable while*
40 *not impacting Hydro or Hydro's customers.*

1 Please confirm that the above principle continues to apply in respect of
2 costs proposed to be specifically assigned to Industrial Customers,
3 including Braya in the instance of the costs proposed to be specifically
4 assigned to Braya in the present Application.

DATED at St. John's, in the Province of Newfoundland and Labrador, this ^{9th} day of September, 2025.

POOLE ALTHOUSE

Per:


Glen G. Seaborn


STEWART MCKELVEY

Per:


Paul L. Coxworthy

COX & PALMER

Per:


Denis Fleming

- TO: The Board of Commissioners of Public Utilities
Attention: Ms. Jo-Anne Galarneau, Board Secretary, Ms. Jacqui Glynn,
PUB Official Email
- TO: Newfoundland & Labrador Hydro
Attention: Ms. Shirley Walsh, NLH Regulatory
- TO: Newfoundland Power Inc.
Attention: Mr. Dominic J. Foley, NP Regulatory
- TO: Labrador Interconnected Group
Attention: Senwung F. Luk, Nick Kennedy
- TO: Consumer Advocate
Attention: Mr. Dennis Browne, K.C., Mr. Stephen F. Fitzgerald, K.C.,
Ms. Sarah Fitzgerald, Ms. Bernice Bailey