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B A R R I S T E R S A N D S O L I C I T O R S

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September 21, 2026

Sent via E-mail and Courier

Board of Commissioners of Public Utilities

Att'n: Mike McNiven, Board Secretary
120 Torbay Road
Prince Charles Building, Suit E-210
St. John's, NL A1A 2G8
Email: mmcniven@pub.nl.ca

Attention: Mr. Mike McNiven, Board Secretary

Dear Mr. McNiven:

**Re: Newfoundland and Labrador Hydro 2026 General Rate Application
Requests for Information of the Labrador Interconnected Group**

On behalf of the Labrador Interconnected Group, please find enclosed Requests for Information LAB-NLH-034 to LAB-NLH-049, dated September 21, 2026, in relation to the above-noted Application.

Sincerely,

Yours truly,
Olthuis, Kleeer, Townshend LLP
PER:

NICK KENNEDY
PARTNER

NK/kf

Encl. RFIs of the Labrador Interconnected Group

cc. Glen G. Seaborn
Denis J. Fleming

Public Utilities Board

Jacqui Glynn
Ryan Oake
Mike McNiven
Colleen Jones
Board Record
Michael Collins

Newfoundland and Labrador Hydro

Shirley Walsh
Daniel Simmons
NLH Regulatory

Newfoundland Power Inc.

Dominic Foley
Douglas Wright
Liam O'Brien
NP Regulatory

Consumer Advocate

Adrienne H. Y. Ding
Justin W. King, O'Dea Earle
Consumer Advocate General

Iron Ore Company of Canada

Gregory A. C. Moores, Stewart McKelvey

IN THE MATTER OF the *Electrical Power Control Act, 1994*, SNL 1994, Chapter E-5.1 (the "*EPCA*") and the *Public Utilities Act*, RSNL 1990, Chapter P-47 (the "*Act*"), as amended, and regulations thereunder; and;

IN THE MATTER OF a general rate application by Newfoundland and Labrador Hydro to establish customer electricity rates for 2027.

Requests for Information

by the Labrador Interconnected Group

LAB-NLH-034 to LAB-NLH-049

September 21, 2026

**LAB-NLH-34 Re: 2026 GRA – Volume I, Schedule A-II: Actual and Forecast
Electricity Requirements for 2019–2027**

Follow-up to LAB-NLH-001

Preamble:

It is standard practice for other Canadian utilities to update and file their long-term load forecasts with their general rate applications. For example, Manitoba Hydro filed its 20-year load forecast as Appendix 4.1 to its more recent GRA (<https://www.pubmanitoba.ca/v1/proceedings-decisions/appl-current/mh-26-28-application.html>)

In response to part b), NLH confirms that the 2023 Planning Load Forecast is the most recent publicly available long-term load forecast for the LIS prior to the 2026 GRA. Yet, in response to LAB-NLH-030, NLH attaches the NLSO 2026 Annual Planning Assessment that notes (in Section 4) that NLH produced a LIS long-term load forecast in June 2025. It is not clear whether this long-term forecast is the same “June 2025 Operating Load Forecast” noted in the 2026 GRA.

- a) Please file the most recent long-term load forecast prepared by NLH for the LIS; and
- b) Please confirm that there is no change in forecasting methodologies between this most recent long-term load forecast and the June 2025 Operating Load Forecast

**LAB-NLH-35 Re: 2026 GRA – Volume I, Schedule A-II: Actual and Forecast
Electricity Requirements for 2019–2027**

Follow-up to LAB-NLH-001 and LAB-NLH-003

Preamble:

In response to LAB-NLH-001, Hydro provided the Operating Interconnected Load Forecast for June 2025 through December 2029. In this table, “Dept. of National Defence” is listed as a separate line item having no energy or capacity until September 2029 and then increasing to 18.2 MW and 10.5 GWh in December 2029.

In response to LAB-NLH-003, Hydro provided the following table as “the demand (non-coincident) and energy requirements on a monthly basis” for 5 Wind Goose Bay. No year is provided for this Table 1 though it appears to match future requirements after December 2029.

Table 1: Firm Demand and Energy Requirements for 5 Wing Goose Bay

	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Demand (MW)	18	18	18	16	13	8	5	5	7	13	17	18
Energy (GWh)	10	9	9	7	6	3	3	3	3	7	10	11

- a) Please confirm whether the line item “Dept. of National Defence” in the Operating Interconnected Load Forecast refers only to future heating electrification load at 5 Wing Goose Bay and, if not, please explain further.
- b) Please explain why the demand and energy requirements for “Dept. of National Defence” in the Operating Interconnected Load Forecast are 0 MW and 0 GWh prior to September 2029. For example, are there no current requirements for capacity and energy from the Dept. of National Defence or are these included in the “Goose Bay” line item?
- c) Please confirm that the “Dept. of National Defence” (and “5 Wing Goose Bay” if this is a different entity) is a customer of NLH and provide the year in which DND became a customer or, if that information is unknown, confirm that DND has been a customer since 2019.

**LAB-NLH-36 Re: 2026 GRA – Volume I, Schedule A-II: Actual and Forecast
Electricity Requirements for 2019–2027**

Follow-up to LAB-NLH-004

Preamble:

In response to this RFI, Hydro indicated that “There are no outstanding requests for firm service for cryptocurrency customers, as any that are received are denied pursuant to the Order in Council.”

Please confirm whether any of the existing cryptocurrency customers currently receiving firm service have been allocated firm service that has not yet been utilized. For example, a customer requested and was approved for 10 MW but is only currently using 5 MW to date. Please quantify these approved but yet unutilized capacity requirements, if any.

**LAB-NLH-37 Re: 2026 GRA – 2026 GRA Volume 1, Table 1-1 Estimated July 1,
2027, Rates Increases by Customer Class**

Follow up to LAB-NLH-006

Citation: LAB-NLH-006 response to part c)

Preamble:

1 In response to part c) NLH refers to NLH's response to part g) of LAB-NLH-001, which
2 addresses forecasting methodology only.

3 Please provide updated tabular and graphical actuals and forecasts from 2015 to 2035 for
4 reference, medium and high growth scenarios for the LIS in terms of i) annual customer
5 coincident demand and ii) annual energy demand. 3 4

6 **LAB-NLH-38 Re: GRA, Vol. I, page 75 pdf**

7 Follow-up to LAB-NLH-010

8 Citation: LAB-NLH-010 response to part b)

9 Under the Labrador Residual Block PPA, Hydro purchases energy from Muskrat Falls at
10 the Monthly Average Sales Price, as defined in the Labrador Residual Block PPA, less the
11 Newfoundland and Labrador System Operator ("NLSO") Average 1 Rate...

12 Preamble:

13 IN response to part b) NLH has provided a written description of the pricing element in Note 33.

14 Please supplement this written description with an annotated line-by-line numerical illustration
15 of the typical calculations entailed in the written description.

16 **LAB-NLH-39 Re: 2026 GRA – Volume 1, Section 1.3.1 The Electricity System**

17 Follow-up to LAB-NLH-011

18 Preamble:

19 In response to part a), NLH provides links to system maps dated February 12, 2024. These do not
20 appear to be the most up-to-date system maps. In response to LAB-NLH-030, NLH attached the
21 NLSO 2026 Annual Planning Assessment that includes system maps (Appendix A) dated
22 February 2025. It is not clear whether these are the most up-to-date maps of the LIS.

23 Please provide (or provide a link) to the most up-to-date LIS and IIS system maps produced by
24 NLH that are demonstrably similar to those provide in the NLSO 2026 Annual Planning
25 Assessment.

26 **LAB-NLH-40 Re: GRA, Vol. I, page 205 pdf**

27 Follow up to LAB-NLH-014

1 In response to part c), NLH states that a 10% one-time increase (including deficiency recovery)
2 would leave no deficiency between 2027 and the next GRA.

3 Please provide year-by-year figures for the scenarios listed in a) and b) of NLH-014.

4 In response to part e), NLH refers to NLH's response to IOC-NLH-013.

5 Please explain why Hydro thinks it is in the interest of Labrador consumers to defer the costs
6 listed in Table 6-10 and to pay interest on the deferral amounts.

7 **LAB-NLH-41 Re: GRA, Vol. I, page 170-171 pdf**

8 Follow up to LAB-NLH-024(d)

9 Preamble:

10 In response to LAB-NLH-024(d), NLH referred to its response in LAB-NLH-024(c), which was
11 not responsive to LAB-NLH-024(d).

12 Please explain the ratemaking rationale for allowing LTSCVDA balances (and associated
13 financing charges) to accumulate over a four-year period without interim rate relief or refund, and
14 discuss the customer rate-shock and intergenerational equity implications of that approach.

15 **LAB-NLH-42 Re: 2026 GRA – Volume 1, Section 6.9.1 Rate Structure, p. 203 pdf**

16 Follow-up to IOC-NLH-001 (Attachment #1) and LAB-NLH-029 and LAB-NLH-030

17 Preamble:

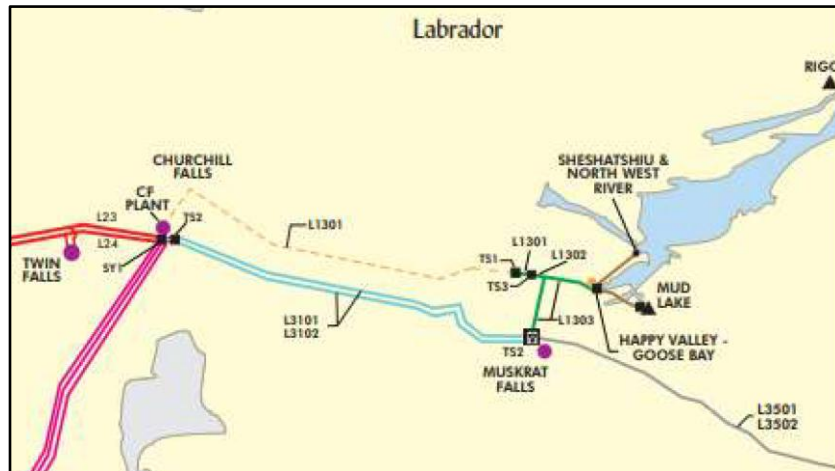
18 Table 1 summarizes the information provided by NLH by location in response to IOC-NLH-001
19 and LAB-NLH-029:

20 **Table 1: Summary Table – Capital Additions Labrador Interconnected System (\$)**

Location	Asset Count	NBV Average	Depreciation	Original Capital Cost
Wabush Substation	9	18,128,439	354,391	18,713,989
Wabush Terminal Station	156	30,868,855	759,788	34,314,654
Happy Valley-Goose Bay Terminal Station	47	7,615,996	184,967	8,531,057
Muskrat Falls Terminal Station 2	28	3,177,322	76,626	3,778,820
Various	2	(24,317)	0	(1,075,266)
Transmission Line 1303	32	1,948,989	42,643	2,266,108
Terminal Station	4	595,851	14,417	745,885
Muskrat Falls Terminal Station 1	11	613,012	13,291	675,064
Transmission Line 1302	2	385,834	8,049	426,089
Churchill Falls Switchyard	13	1,282,843	27,825	1,429,934
N/A	1	121,308	0	0
Happy Valley-Goose Bay	2	77,082	5,502	110,045
Churchill Falls Terminal Station	2	60,096	2,114	73,924
Total	309	64,851,310	1,489,613	69,990,303

In response to LAB-NLH-030, NLH attached the NLSO 2026 Annual Planning Assessment that includes system maps (Appendix A) dated February 2025. Figure 1 illustrates the system in Labrador East.

Figure 1: Provincial Generation and Transmission Grid Labrador East



Based on the system configuration in Figure 1, TS1 appears to be behind TS3, and appears to service only an out of service (and soon to be decommissioned) L1301. TS3 appears on the system map of the LIS but is not listed among Capital Additions Labrador Interconnected System in response to IOC-NLH-001. The system maps contained in the NLSO 2026 Annual Planning Assessment are not sufficiently detailed (and potentially inaccurate) for determining which system assets are part of the LIS (and in the LIS rate base) and which part of the Labrador Transmission Assets (and in the IIS rate base).

- a) Please list, describe and define the purpose of all primary network components (generators, circuits, substations, breakers, transformers, etc.) including voltage, capacities and system asset id numbers of:

- 1 a. the Muskrat Falls Project;
- 2 b. the Labrador Transmission Assets;
- 3 c. the Labrador Interconnected System.
- 4
- 5 b) Please provide a sufficiently detailed and up-to-date single line diagram of the LIS,
- 6 showing the primary network components identified in part a)
- 7 c) Please confirm that Table 1 in the Preamble is correct or provide a similar summary table
- 8 by the locations listed in the Capital Additions Labrador Interconnected System provided
- 9 in response to IOC-NLH-001.
- 10 d) Please clarify whether Muskrat Falls Terminal Station 1 in Capital Additions Labrador
- 11 Interconnected System filed in IOC-NLH-001 refers to the terminal station labelled in
- 12 Figure 1 as “TS1” at the eastern terminus of L1301 and, if not, to what it refers.
- 13 e) Please indicate whether NLH intends to decommission TS1 shown in Figure 1 as part of
- 14 the decommissioning of L1301 and, if not, why not.
- 15 f) Please confirm that the ~\$0.675 million capital costs of Muskrat Falls Terminal Station 1
- 16 in Capital Additions Labrador Interconnected System filed in IOC-NLH-001 represent
- 17 the entirety of the capital costs of this asset. If not, indicate which other portions are
- 18 contained in the Labrador Transmission Assets, in Muskrat Falls or elsewhere.
- 19 g) Please clarify whether Muskrat Falls Terminal Station 2 in Capital Additions Labrador
- 20 Interconnected System filed in IOC-NLH-001 refers to the terminal station labelled in
- 21 Figure 1 as “TS2” adjacent to the CF Plant generating station, to the terminal station
- 22 labelled in Figure 1 as “TS2” adjacent to the Muskrat Falls generating station, to both, or
- 23 to something else.
- 24 h) Please confirm that the ~\$3.8 million capital costs of Muskrat Falls Terminal Station 2 in
- 25 Capital Additions Labrador Interconnected System filed in IOC-NLH-001 represent the
- 26 entirety of the capital costs of this asset. If not, indicate which other portions are
- 27 contained in the Labrador Transmission Assets, Muskrat Falls or elsewhere.
- 28 i) Please indicate whether TS3 exists on the LIS and, if it is on the LIS, explain why no
- 29 capital costs are allocated to it in Capital Additions Labrador Interconnected System filed
- 30 in IOC-NLH-001.
- 31 j) Please list all assets that were decommissioned a) in relation to the decommissioning of
- 32 Line L1301 and b) for any other reason, since the last GRA. For each, please provide:
- 33
- 34 a. The book value prior to decommissioning,
- 35 b. The reason for the decommissioning, and
- 36 c. The accounting treatment of the residual value.

1 **LAB-NLH-43 Re LAB-NLH-028**

2 Chart 2-5 cannot be represented with an equivalent for the Labrador Interconnected
3 System, as customer load in Labrador West is supplied from Churchill Falls assets, while
4 the Labrador East load is supplied from Muskrat Falls assets, which was presented in
5 Chart 2-7.

6 P.U. 9(2019), p. 2

7 On November 30, 2018, Hydro filed an update in relation to the Project which stated:

8 By interconnecting Happy Valley to Muskrat Falls TS2, Labrador East will receive
9 Churchill Falls Power via the new 315 kV system and the single 138 kV transmission
10 line, which will be reduced in length from 269 km to 36 km. This new
11 interconnection will improve reliability and increase capacity for the Labrador East
12 System.

- 13 a) Please clarify if Labrador East load is supplied from Churchill Falls generating assets
14 or from Muskrat Falls generating assets.
15 b) Please specify what costs, if any, related to the Muskrat Falls Happy Valley
16 Interconnection are assigned to the Labrador Interconnected System, and which entity
17 bears the remainder of its costs.

18 **LAB-NLH-44 Re: LAB-NLH-030**

19 Follow up to LAB-NLH-006, LAB-NLH-007, LAB-NLH-030, LAB-NLH-031

20 In LAB-NLH-030, Hydro produces the NLSO Annual Planning Assessment. In S.3.2 of
21 the that document, NLSO acknowledges that they have undertaken studies and arrived at
22 a preferred Labrador West Transmission alternative. However, there has been no
23 engagement of the Board or other interested parties to date before the Board.

24 Citation (pp. 6-7):

25 **3.2 Labrador Incremental Load**

26 Hydro is currently undertaking a process to investigate large incremental customer load
27 requests in Labrador. These incremental requests are beyond the baseline forecast and
28 outside of the scope of any Annual Assessment.

29 Transmission system expansion requirements to serve incremental customers in Labrador
30 East were assessed in a standalone study in 2024 in accordance with Hydro's Network
31 Addition Policy. The study concluded that additional transformation⁸ is required at the
32 Happy Valley Terminal Station by the winter of 2029/2030 to facilitate the firm load

requests in Labrador East. This has been assessed as part of the 2026 Hydro Annual Assessment.⁹

In 2024, Hydro received a number of formal written large load requests in Western Labrador to support existing operations and future critical mineral projects. To assess the feasibility of serving this load, Hydro undertook a Transmission Feasibility Study. The study was funded by participating customers and The Government of Canada through the Smart Renewables and Electrification Pathways Program (“SREPs”).

From the study, a single 735 kV transmission line was the identified solution to support Labrador West load growth. In 2026, Hydro will continue to work with participating customers to advance Front-End Engineering Design for the proposed transmission project.

The proposed project consists of a single circuit 735kV transmission line; connection to the existing Churchill Falls facility; and a new high-voltage alternating current (“HVac”) Terminal Station at Flora Lake in Labrador West. The line and station would initially operate at a lower voltage, transitioning to higher operating voltages as long-term industrial demand grows.

An objective of the upcoming Front-End Engineering Design work will be to determine the amount of load that can be served for each proposed operating level (230 kV, 315 kV and 735 kV), thereby determining thresholds for progression through operating stages.

Hydro continues to work with Hydro Quebec (“HQ”) to assess potential solutions involving an interconnection between Labrador West and the HQ transmission system.

Hydro continues to assess the availability of non-firm supply to Labrador East and West for potential customers willing to be interruptible.

a) Please provide the following studies referred to in the citation:

a. The 2024 standalone study in accordance with Hydro’s Network Addition Policy.

b. the 2026 Hydro Annual Assessment,

c. the 2024 Transmission Feasibility Study, in response to the receipt of a number of formal written large load requests in Western Labrador to support existing operations and future critical mineral projects

b) For the project proposed as a result of the Transmission Feasibility Study, please provide:

a. A detailed map of the proposed infrastructure,

- b. A detailed list of any system modifications required to implement it, with a detailed map showing their locations,
- c. The forecast commissioning dates, with the capital cost and revenue requirement impacts expected for each.

- c) Please quantify the additional capital costs that result from building a 735 kV line, as opposed to a) a 230 kV or b) 315 kV line.
- d) Please specify the transfer capacity for each of these three voltage levels, and specify when Hydro expects these thresholds to be crossed, given the information it has at this time regarding future loads.
- e) Please elaborate on the risks for ratepayers in the event that the additional loads required to go beyond the transfer capacity of a) a 230 kV line or b) a 315 kV line should not materialize.
- f) Please explain why these materials have not been brought to the attention of the Board or other stakeholders before this time.

Please indicate when and in what manner Hydro intends to bring this matter before the Board.

LAB-NLH-45 Re: LAB-NLH-004

Citation:

To the best of Newfoundland and Labrador Hydro's ("Hydro") information, there are two cryptocurrency customers currently receiving electricity service in Labrador East, and three cryptocurrency customers currently receiving electricity service in Labrador West.¹ There are no other types of data centre customers currently receiving service. All of these customers are receiving firm service, as their service predated Order in Council OC2022-266, and as per paragraph b) of that Order in Council:

. . . the exemption shall not apply to cryptocurrency mining applicants who were approved for and receiving service as a cryptocurrency mining customer at the time of the issuance of this Order in Council, as long as they continue to receive that service. . .

As such, the amount of firm service currently provided to cryptocurrency customers in Labrador is more than zero.

Please provide the following information regarding each cryptocurrency customer receiving firm service:

- a) Location (approximate)
- b) Power on Order (kW)
- c) Energy consumption for each of the last five (5) years
- d) Forecast energy consumption for each year of the GRA

- a) Please provide detailed, up-to-date and separate maps of the LIS and IIS networks, similar to the one found in the Preamble, including the following:
- a. Geographical details, including municipalities, First Nations, waterbodies, etc.;
 - b. Transmission control regions (e.g., NLSO, NLH, NP, etc.);
 - c. All transmission lines, including voltages, type (AC/DC), asset identifications (e.g. L2304, etc.), ownership (NLH, LTC, NP, other) and operational status (e.g., if decommissioned or inoperable);
 - d. Interconnections with other provinces;
 - e. Substations, including type (e.g., terminal, switching, electrodes, etc.), ownership and operational status; and any
 - f. All remote and interconnected generating stations, including type, installed capacity, and ownership.

LAB-NLH-48 Re: LAB-NLH-021

Citation:

The costs associated with the Muskrat Falls project are allocated only to customers on the Island Interconnected System. As outlined in part a) of this response, Rural Labrador Interconnected System customers are allocated a portion of the rural deficit resulting from supply cost variances in the Rural Island Interconnected deficit areas, consistent with cost allocation in the Cost of Service Study and past practice for disposition of deferral account balances related to supply costs.

- a) Are any costs associated with the Muskrat Falls project allocated to Rural Island Interconnected customers? If so, please explain in detail how this allocation is carried out.
- b) In the affirmative, please explain in detail the mechanism by which costs associated with the Muskrat Falls project are excluded from the Rural Deficit, of which Rural Labrador Interconnected System customers pay a share.

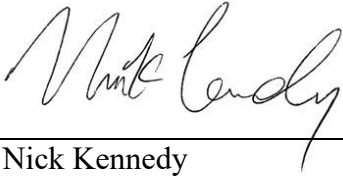
LAB-NLH-49 Re: IOC-NLH-111

Preamble:

Table 1 shows that the Labrador Interconnected Transmission-Demand Revenue Requirement has increased since the last GRA by 82.3%, from \$6.3 million to \$11.5 million.

- a) Please provide a table showing the components resulting in this increase, including for 2019TY and 2027TY:
 - a. Labrador transmission rate base value,
 - b. Labrador transmission capital costs,

- 1 c. Labrador transmission operating costs, and
 2 d. Any other relevant components.
 3 b) Please explain in detail the reasons for this very substantial increase.
 4 c) Can similar increases be expected in the future? Please present a similar table with
 5 forecast values for 2031TY, 2035TY and 2040TY.
- 6 All of which is respectfully submitted this September 21, 2026



Nick Kennedy
 For the Labrador Interconnected Group

TO: The Board of Commissioners of Public Utilities
 Newfoundland and Labrador Hydro
 Newfoundland Power Inc.
 Consumer Advocate
 Iron Ore Company of Canada
 Island Industrial Customer Group