**IN THE MATTER OF** the Public Utilities Act (r.S.N. 1990, Chapter P-47 (the "Act")

AND IN THE MATTER OF a General Rate Application (the "Application") by Newfoundland and Labrador Hydro ("Hydro") for approvals of, under Section 70 of the Act, changes in the rates to be charged for the supply of Power and energy to Newfoundland Power, Rural Customers and Industrial Customers; and under Section 71 of the Act, changes in the Rules and Regulations Applicable to the supply of electricity to Rural Customers.

## ISSUES LIST OF THE TOWN OF LABRADOR CITY AND THE TOWN OF WABUSH

In the submission of the Town of Labrador City and the Town of Wabush, the issues Arising in this proceeding are as follows:

- 1. Whether the so-called Labrador interconnected system (LIS) comprising two areas, Happy Valley-Goose Bay in the east and Labrador City-Wabush in the west is in fact An interconnected integrated single system requiring common rates applicable to both Happy Valley Goose Bay and Labrador West consumers.
- 2. The basis on which rates ought to be set for domestic customers in Labrador West.
- 3. Whether the Public Utilities Board ought to recommend the Government that the social costs associated with the rural deficit would more efficiently and fairly be collected through a dedicated tax on all energy produced in the Province (whether exported or not) rather than allocated to certain customers in Hydro's system.

**DATED** at Labrador City, Newfoundland and Labrador this 12<sup>th</sup> day of September, 2003.

Miller & Hearn
Solicitors for the Town of Labrador City and
the Town of Wabush