



March 22, 2016

Ms. G. Cheryl Blundon
Board of Commissioners of Public Utilities
120 Torbay Road, P.O. Box 12040
St. John's, NL A1A 5B2

Dear Ms. Blundon:

Re: Newfoundland Power 2016-2017 General Rate Application

In relation to the above noted application please find enclosed one (1) original and twelve (12) copies of the Consumer Advocate's Issues List. The Consumer Advocate's Witless List remains unchanged from that filed on February 26, 2016.

A copy of this correspondence, together with the enclosures, has been forwarded directly to the parties listed below.

We trust the foregoing is found to be in order.

Yours very truly,

O'DEA, EARLE

A handwritten signature in blue ink, appearing to read 'T. Johnson', is written over the printed name 'O'DEA, EARLE'.

THOMAS JOHNSON, Q.C.

TJ/cel
Encl.

cc: Newfoundland & Labrador Hydro
Attention: Geoffrey P. Young, Senior Legal Counsel

Newfoundland Power
Attention: Peter Alteen, Q.C.

Curtis, Dawe
Attention: Ian F. Kelly, Q.C.

IN THE MATTER OF

the *Public Utilities Act*, R.S.N.L. 1990,
Chapter P-47 (the "*Act*"), as amended;

AND

IN THE MATTER OF

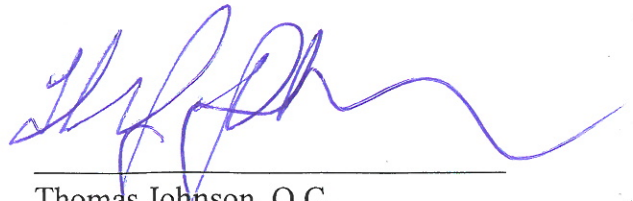
A General Rate Application (the "Application")
by Newfoundland Power Inc. ("Newfoundland Power")
to establish customer electricity rates for 2016 and 2017.

CONSUMER ADVOCATE'S ISSUES LIST

In the Consumer Advocate's submission, the issues arising in the proceeding are as follows:

1. Forecast Revenue Requests for customer rates for 2016 of \$669,160,000.00 and for 2017 of \$680,421,000.00.
2. What is a fair return on equity for Newfoundland Power Inc. in 2016 and 2017?
3. What is an appropriate capital structure for Newfoundland Power Inc. in 2016 and 2017?
4. Conservation and Demand Management initiatives and programming.
5. Executive Compensation.
6. Performance Targets.
7. Such other issues as may arise.

Dated at St. John's in the Province of Newfoundland and Labrador, this 22nd day of March, 2016.



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St. John's, NL A1C 5X4
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Email: tjohnson@odeaearle.ca

To: Newfoundland Power Inc.
Attention: Ian F. Kelly, Q.C./Peter Alteen, Q.C.

Newfoundland and Labrador Hydro
Attention: Mr. Geoffrey Young, Senior Legal Counsel