NL Forest Industry Association

November 5, 2019

Attention:

Public Utilities Board Rate Mitigation Review P.O. Box 21040 St. John's NL A1A 5B2

Re: Electricity Rate Mitigation Options and Impacts in relation to the Muskrat Falls Project

The Public Utilities Board (PUB) Mandate states that the "Board is responsible for the regulation of the electric utilities in the province to ensure that the rates charged are just and reasonable, and that the service provided is safe and reliable."

The NL Forest Industry Association (NLFIA) represents directly and indirectly private businesses engaged in the provincial heating sector.

The NLFIA would consider expenses or funds allowed by the PUB in support of Muskrat Falls rate mitigation through electrification fuel switching as being unfair and discriminatory towards other renewable sector businesses competitively engaged in the provincial heating market.

Publicly regulated electric utilities are guaranteed financial rates of returns. These large corporations should not be allowed to employ public or privately acquired funds in an attempt to shift market share away from non-regulated businesses competing within the same private sector marketplace.

The PUB has been requested by the provincial government to provide rate mitigation options to increase the domestic load through electrification. The NLFIA believes that if public funds are to be used in an attempt to influence the provincial heating marketplace then government should do so through public and fiscal policy and not through crown or private electric utility corporations which the PUB has the responsibility to regulate.

Sincerely,

Bill Dawson

Executive Director

NL Forest Industry Association

CC: Mr. Dennis Browne, Provincial Consumer Advocate