IN THE MATTER OF the Electrical Power Control Act, R.S.N.L. 1994, Chapter E-5.1 (the "EPCA") and the Public Utilities Act, R.S.N.L. 1990, Chapter P-47 (the "Act") and regulations thereunder:

AND IN THE MATTER OF Board Order No. P.U. 43(2017) in relation to Newfoundland and Labrador Hydro's ("Hydro") 2018 Capital Budget Application;

AND IN THE MATTER OF the Network Additions Policy Review, dated October 1, 2018; the Labrador Interconnected System – Network Additions Policy dated December 14, 2018; the Labrador Interconnected System Transmission Expansion Study dated October 31, 2018; the Labrador Interconnected System Transmission Expansion Study Revision 1 dated November 5, 2018; and the Labrador Interconnected System Transmission Expansion Study Revision 2 dated April 3, 2019, filed by Hydro.

1

REQUESTS FOR INFORMATION OF THE ISLAND INDUSTRIAL CUSTOMERS GROUP

2 IC-PUB-001 to IC-PUB-001
3 Issued June 11, 2020

4 IC-PUB-001 Brattle's report page 14 (footnote 21) notes BC Hydro's 5 definition of financial security to be: "The security for costs may include 6 an irrevocable letter of credit, a contract bond, a guarantee by a 7 corporation other than the Customer, a bank term deposit to be 8 deposited in trust for B.C. Hydro, a negotiable bearer bond that is 9 government guaranteed at face value, or a prepayment on account." 10 11 Is Brattle's concept for financial security the same as BC Hydro's 12 definition? Does Brattle recommend requiring financial security for all loads with an expected 25 plus years worth of sales or only for those which are more mobile or speculative (e.g., cryptocurrency versus hard rock mines)?

<u>DATED</u> at St. John's, in the Province of Newfoundland and Labrador, this June, 2020.

day of

POOLE ALTHOUSE

Per: Dean A. Porter

STEWART MCKELVEY

Per: 9
Paul L. Coxworthy

COX & PALMER

Per: ______ Denis J. Fleming

TO: The Board of Commissions of Public Utilities Suite E210, Prince Charles Building 120 Torbay Road P.O. Box 21040 St. John's, NL A1A 5B2

Board Secretary

Newfoundland & Labrador Hydro Hydro Place 500 Columbus Drive P.O. Box 12400 St. John's, NL A1B 4K7 Attention: Shirley Walsh

Attention:

Newfoundland Power 55 Kenmount Road P.O. Box 8910 St. John's, NL A1B 3P6

Attention: Gerard Hayes

Senior Legal Counsel

Consumer Advocate
Browne Fitzgerald Morgan & Avis
2nd Floor, Terrace on the Square
P.O. Box 23135
St. John's, NL A1B 4J9
Attention: Dennis M. Browne, Q.C.

Labrador Interconnected Group Olthuis Kleer Townshend LLP 250 University Ave., 8th Floor Toronto, ON M5H 3E5 Attention: Senwung Luk

Iron Ore Company of Canada Stewart McKelvey Cabot Place 1100, 100 New Gower Street P.O. Box 5038 St. John's, NL A1C 5V3

Attention: Gregory A.C. Moores