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-LAB-001 to IC-LAB-002 3 Issued June 11, 2020 IC-LAB-001 Reference: Presentation PDF page 13 notes that fuel costs are not 4 5 viewed as an appropriate proxy for reliability benefits. 6 Is it Mr. Raphals contention that existing Labrador customers should pay 7 (through unfunded additions to rate base) for reliability benefits based 8 on some high-value measure (such as VOLL) that would decrease the 9 financial contribution required from the proponent of new load

1		expansions as compared to Hydro's approach? Please discuss the
2		reasoning for the answer.
3	IC-LAB-002	Does the answer to question 1 depend on whether, at the time the new
4		customer comes on line, the system is in a reliability constraint versus
5		largely indicating sufficient reliability?
		<i>/1</i> (

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

day of

POOLE ALTHOUSE

Dean A. Porter

STEWART MCKELVEY

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

Attention: Board Secretary

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

250 University Ave., 8th Floor Toronto, ON M5H 3E5

Olthuis Kleer Townshend LLP

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