

WHENEVER. WHEREVER.  
We'll be there.



August 27, 2021

Board of Commissioners  
of Public Utilities  
P.O. Box 21040  
120 Torbay Road  
St. John's, NL A1A 5B2

Attention: G. Cheryl Blundon  
Director of Corporate Services  
and Board Secretary

Dear Ms. Blundon:

**Re: Newfoundland Power's 2022 Capital Budget Application (the "Application") –  
Consumer Advocate's proposed Requests for Information CA-NP-117 to  
CA-NP-175**

On August 20, 2021, the Consumer Advocate filed 59 additional requests for information ("RFIs") and requested an amendment to the *2022 Capital Budget Application's* schedule of dates to allow for responses to be filed.

On August 25, 2021, the Board requested comments from the parties on whether some or all of the additional RFIs should be permitted, as well as the parties' position on the requested amendment of the schedule.

In Newfoundland Power's view, permitting additional RFIs is consistent with the Board's authority under the *Public Utilities Act* (the "Act"). Section 16 of the Act establishes that the Board is responsible for the general supervision of public utilities and has the right to obtain from a public utility all information necessary to enable the Board to fulfil its duties. Newfoundland Power is therefore agreeable to responding to the additional RFIs at the Board's direction to further its understanding of the Application.

With regard to the Consumer Advocate's request for an amendment to the schedule of dates to allow for responses to RFIs CA-NP-117 to CA-NP-175, following direction from the Board, Newfoundland Power would require approximately two weeks to file responses.

**Newfoundland Power Inc.**

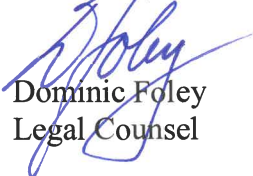
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Please feel free to contact the undersigned with any questions or comments.

Yours truly,



Dominic Foley  
Legal Counsel

c. Shirley Walsh  
Newfoundland and Labrador Hydro

Dennis Browne, QC  
Consumer Advocate

**Newfoundland Power Inc.**

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