

1 Q. **Re: IN-NLH-268**

2 Hydro declined to provide the information requested, stating that the “request is
3 unduly onerous, and requests information which is beyond that which is relevant to
4 the issues at hand. The time, effort, and expense involved in the compilation of the
5 requested information is not warranted by or proportional to the relevance, if any,
6 of the information sought, by the significance of that information in the proceeding,
7 or by the probative value of the results.”

8 Please explain:

- 9 • why this information was relevant to an RFI based on the original
10 application, but is not relevant in the amended application,
11 • why its compilation in response to an RFI in relation to the original
12 application was not unduly onerous, but now it is,
13 • why the Labrador Interconnected System was excluded from the response
14 to the original RFI.

15 Please provide an updated Revenue Requirement Variance Analysis similar to the
16 one presented in NP-NLH-99 rev. 1, Att. 1, for the Labrador Interconnected System
17 only.

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20 A. The original Request for Information, NP-NLH-099 posed the question “[f]or each of
21 the Provincial electrical systems, provide the detailed reasons (and related dollar
22 impacts) for the annual changes in the rural deficit for the period from 2007 to 2012
23 and forecast 2013, 2014, 2015 and 2016. (Rates and Regulation Evidence, page 4.4,
24 lines 3 to 4)”. The Labrador Interconnected System does not contribute to the rural
25 deficit, and therefore was excluded in Hydro's response to NP-NLH-099. The current
26 response to NP-NLH-099 provides the annual rural deficit reports provided to the

Board. Hydro believes the current response provides the most useful data in response to the question.

Hydro required approximately four months to respond to the first round of GRA RFIs. The requested analysis for the rural deficit information required approximately one week to complete. Completing this analysis for the Labrador Interconnected System would contribute to delays in meeting timelines as prescribed by the Board. The time, effort, and expense involved in the compilation of the requested information is not warranted by or proportional to the relevance (if any) of the information sought, by the significance of that information in the proceeding, or by the probative value of the results.