

1 **Q. McShane Evidence – Please provide a copy of all documents, reports, articles, etc.**  
2 **cited by Ms. McShane in her testimony including those listed on p. G-2.**

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4 A. This request is overly broad and unfocussed and Newfoundland Power objects to the  
5 production requested on the basis that (i) it is insufficiently specific and (ii), in the  
6 circumstances, not necessary for a satisfactory understanding of the matters to be  
7 considered on this Application.

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9 For example, full production of every Order of the Board referred to by Ms. McShane in  
10 her testimony is not *required* for a satisfactory understanding of matters to be considered  
11 on this Application when the Orders are publicly available. In addition, many of the  
12 documents captured by this broad request were provided to the Consumer Advocate in  
13 prior proceedings so they are already in his possession or control.

14  
15 If the Consumer Advocate requires disclosure of *specific* documents that are necessary  
16 for the purpose of a satisfactory understanding of the matters to be considered, then he  
17 should indicate the *specific* documents required.