ERS AND SOUTETTORS

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May 25, 2015

## SENT VIA E-MAIL

Ms Cheryl Blundon Newfoundland and Labrador Board of Commissioners of Public Utilities 120 Torbay Road, PO Box 21040 St John's NL A1A 5B2

Dear Ms Blundon:

## Re: NLH Responses to Innu Nation RFIs

Innu Nation is in receipt of your communication of 22 May 2015 with respect to the responses of Newfoundland and Labrador Hydro ("NLH") to certain Requests for Information ("RFIs") posed by Innu Nation. We write to comment on your letter.

The RFIs in question, posed by Innu Nation, are at the heart of a substantial part of its case before the PUB. NLH's answers to them, and our responses to those answers, will form an essential part of our case. Given that NLH has been unable to meet the original May 6 deadline for responses to RFIs, but is now proposing to respond to them by June 12, 2015, Innu Nation proposes that the timeline established by the PUB must be extended with respect to Innu Nation. We would suggest the following new dates be applied to Innu Nation and its evidence:

- June 23: Experts' Reports and Pre-Filed Evidence
- June 26: RFIs on Expert Reports filed
- July 10: Responses to RFIs on Experts' Reports filed
- July 15: Reply evidence from Hydro
- July 20: Filing of issues for settlement discussions

We suggest these new dates based on a balancing of the need for efficient proceedings, versus the need for each party to comprehensively introduce its evidence.

If it turns out, however, that NLH's responses to Innu Nation's RFIs must be the subject of motions, then Innu Nation may need to further vary the dates above.

We thank the Board in advance for its indulgence and understanding of these matters.

Yours truly,

Olthuis Kleer Townshend LLP

Senwung Luk

## SL/tm

c. Newfoundland Power Inc
Consumer Advocate
Industrial Customer Group
Vale Newfoundland and Labrador Ltd
Towns of Labrador City, Wabush, Happy Valley-Goose Bay and North West River
Yvonne Jones, MP
Newfoundland and Labrador Hydro
Nunatsiavut Government