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May 21, 2015

The Board of Commissioners of Public Utilities Prince Charles Building 120 Torbay Road, P.O. Box 21040 St. John's, Newfoundland & Labrador A1A 5B2

Attention:

Ms. Cheryl Blundon

**Director Corporate Services & Board Secretary** 

Dear Ms. Blundon:

Re:

Newfoundland and Labrador Hydro – 2013 General Rate Application

**Responses to Innu Nation's Requests for Information** 

This is further to the Board's letter of May 8, 2015 regarding Hydro's responses to certain Requests for Information (RFI) from the Innu Nation (IN-NLH-312, IN-NLH-314, IN-NLH-315, IN-NLH-316 and similarly IN-NLH-317).

The RFIs in question specifically require Hydro to review a very large amount of archived material to identify a large body of correspondence and documentation which was generated more than 10 years ago. This review is complicated by the fact that almost all of the people who were involved in the matter at that time are no longer employed by Hydro. Completing this review and identifying the information required for the responses to these RFIs is underway but will likely take an additional number of weeks. The issues that appear to be engaged in these RFIs are not, in Hydro's opinion, amongst those that pertain directly to costs or rate setting issue that affect other matters or parties in the GRA, therefore, they are not in the critical path of information required to inform most of the parties in this proceeding. Hydro therefore requests that the target date to respond to these RFIs be moved to June 12, 2015.

Yours truly,

NEWFOUNDLAND AND LABRADOR HYDRO

Senior Legal Courisel

GPY/jc

cc: Gerard Hayes – Newfoundland Power
Paul Coxworthy – Stewart McKelvey Stirling Scales
Thomas J. O'Reilly, Q.C. – Cox & Palmer
Dennis Browne, Q.C. – Browne Fitzgerald Morgan & Avis

Thomas Johnson – Consumer Advocate Yvonne Jones, MP Labrador Senwung Luk – Olthuis, Kleer, Townshend LLP Genevieve M. Dawson – Benson Buffett