

August 28, 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
Hydro's Revised Witness List and Annotated Issues List**

Attached please find Hydro revised Witness List and an Annotated Issues List. Please note that in the Revised Witness List Mr. Ed Martin will now be testifying as to Policy and Overview items. Previously Mr. Rob Henderson was scheduled with respect to those matters.

The Annotated Parties' Issues Lists is provided for the purpose of assisting the parties and the Board in their cross examination of Hydro's witnesses. It is hoped that the format used here will be found to be helpful. Please note that for ease of reference, the Annotated Issues List has been formatted as closely as practicable to the Issues Lists documents provided by the Intervenors. The only intended change is that for each enumerated issue, the witness panel(s) that Hydro has identified to respond to questions on that issues have been inserted in bold type at the end of each item.

The Annotated Issues Lists represent Hydro's best effort in interpreting the issues provided by the Intervenors, assessing the information that will be required to gain a full understanding of them, and assigning responsibility to address the subject matter raised.

This is subject to the following limitations and caveats:

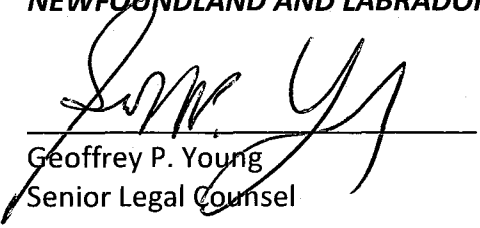
- Many of the issues, while stated briefly and succinctly, are multi-faceted and require information to be provided by a number of areas of expertise and responsibility therefore, they have been assigned to more than one panel;

- Many of the issues are complex and judgments were required by Hydro in the interpretation of the issues and with the identification of evidence that may be elicited on them;
- Some of the issues are of limited or no relevance to this hearing—while panels have been identified to be of assistance in these subject areas, Hydro, and perhaps other parties, can be expected to object to specific questions that may be asked;
- Some of the issues embrace legal arguments as well as evidentiary matters—the selection of a witness panel to deal with a question does not mean that the panel will testify as to matters of law; and
- Some of the Issues have been settled and are included in the Settlement Agreement filed in this matter—in such cases they are noted as “Settled” and have not been assigned to a witness panel.

We trust the enclosed is satisfactory.

Yours truly,

NEWFOUNDLAND AND LABRADOR HYDRO



Geoffrey P. Young
Senior Legal Counsel

GPY/bs

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

Aug 28, 2015

NEWFOUNDLAND AND LABRADOR HYDRO

GRA WITNESS/TOPIC LIST (Revised)

Policy and Overview:

Ed Martin, President and Chief Executive Officer, Newfoundland and Labrador Hydro

- Corporate overview
- Operating and capital expenditures trend
- Overview of historical performance and financial outlook
- Requirement for new deferral mechanisms
- Timing of the application

Human Resources and Organizational Effectiveness

Gerard McDonald, V.P. HROE

Michael Roberts, V.P. HROE (acting)

- Corporate structure
- Employee benefits
- Employee wages
- Recruitment and retention
- Safety - policies
- Vacancy rate

Operations

Robert Henderson, V.P. Newfoundland and Labrador Hydro

Terry Gardiner, Manager Engineering - Transmission and Distribution

Darren Moore, Manager, Transmission and Rural Operations

- Asset management
- Energy supply expenses
- Exploits
- Frequency converter (capital expenditures)
- Key performance indicators
- Labrador West transmission (Twinco assets)
- Management of the Rural deficit
- Operating expenses
- Project execution
- Reliability
- Safety performance

System Operations and Planning

Paul Humphries, V.P. System Operations and Planning

Robert Moulton, Manager Generation and Rural Planning

Paul Stratton, Senior Market Analyst

Kevin Goulding, System Operations Engineering Manager

- Corner Brook Pulp and Paper frequency converter
- Cost recovery for capacity assistance agreements
- Holyrood and other generation costs (capacity vs. energy)
- Holyrood fuel/Energy conversion
- Load forecasts
- NP generation and curtailable credits
- System planning
- Wind power

Cost of Service

Robert Greneman, Lummus Consultants International Inc.

- CDM cost allocation
- Classification of Holyrood (capacity and energy)
- NP curtailable load
- NP rate design
- RSP load variation
- Rural Deficit allocation methodology
- Specifically assigned assets
- Wind purchases (classification)

Finance

Carla Russell, General Manager, Finance and Regulatory

Scott Pelley, Corporate Treasurer

Carol Ann Lutz, Controller

- Calculation of rate base and return on rate base
- Debt guarantee fee
- Deferral account proposals
- Five-year plan
- GRA and regulatory costs
- Intercompany transactions - methodology
- Revenue deficiency recovery

Customer Service and CDM

Dawn Dalley, V.P. Corporate Relations and Customer Service

Barry Brophy, Energy Efficiency Manager

Anthony Lye, Manager of Customer Service

- Billing
- CDM program delivery
- Customer communications
- Customer satisfaction

Rates

Kevin Fagan, Manager, Rates and Regulation

- CDM recovery mechanism
- Hydro Rural rates
- IIC rates phase-in
- NP curtailable load
- NP rate design
- Regulatory outlook (future studies)

Prudence

To be determined

ANNOTATED ISSUES LIST (NLH - Aug 28/2015)

IN THE MATTER OF the *Electrical Power Control Act, 1994*, SNL 1994, Chapter E-5.1 (the "EPCA") and the *Public Utilities Act, RSNL 1990*, Chapter P-47 (the "Act"), as amended, and regulations thereunder; and

IN THE MATTER OF a general rate application by Newfoundland and Labrador Hydro to establish customer electricity rates for 2015.

Issues List of the Consumer Advocate (August 24, 2015)

A. Issues affecting Return

1. What is the appropriate return on equity for 2014 and 2015? **Finance**
2. What is the appropriate capital expenditure level to use in setting the rate base for test year purposes and determining depreciation? **Operations/Finance**
3. What is the appropriate rate base for 2013, 2014 and 2015 (forecast) having regard *inter alia* to the impact of any imprudent projects? **Finance/Prudence**
4. Should Hydro's return be adjusted between rate hearings when Newfoundland Power's return changes as the result of a Newfoundland Power rate hearing or as the result of the application of an annual adjustment formula? **Finance**
5. Should the Board order that a portion of the return be used to offset the rural deficit? **Finance**

B. Revenue Requirement Issues

6. What are Hydro's 2014 and 2015 test year revenue requirements having regard *inter alia* to the impact of any imprudent projects? **Finance/Prudence**
7. Is the amount proposed for the 2014 Revenue Deficiency of \$45.9 million appropriate for recovery from customers? **Operations/Finance**
8. How should any 2014 approved Revenue Deficiency be recovered? **Rates**
9. Has Hydro provided an adequate explanation of cost increases? **Operations/ Finance**
10. Should a productivity/efficiency allowance be applied to the revenue requirement? **Operations**
11. Are the appropriate internal costs properly capitalized? **Operations/Finance**
12. What is the status of the arrangement with Government with respect to Exploits Generation and the implications for future expense treatment. **Operations/Finance**

13. Are the non-regulated costs properly excluded from the revenue requirement, i.e. are the policies on intercompany charges appropriate and are the amounts included in revenue requirement appropriate? **Finance**
14. Is the vacancy factor properly applied? **HROE**
15. Should Hydro's proposed 2015 test year conversion factor for No. 6 fuel at the Holyrood plant be accepted? **Operations/Systems Operations and Planning**
16. Should Hydro's proposed 2015 test year No. 6 fuel price be accepted? **Systems Operations and Planning**
17. Is the debt guarantee fee included in the test year revenue requirement appropriate? **Finance**
18. How should the 2014 and 2015 test year revenue requirements be adjusted to remove costs associated with projects found to be imprudent by the Board? **Prudence**
19. What amount should Hydro be entitled to recover in respect of costs related to the GRA? **Finance Panel**

C. Issues affecting Cost of Service, Rates, Rules and Regulations Issues

20. Is the rate design proposed by Hydro for Newfoundland Power appropriate? **Cost of Service/Rates**
21. Is the proposed amount of the demand charge for Newfoundland Power appropriate? **Cost of Service/Rates**
22. What is the appropriate treatment of Newfoundland Power's curtailable load in Hydro's cost of service Study? **Cost of Service/Rates**
23. Does Newfoundland Power's load factor in Hydro's cost of service study need to be adjusted? **Cost of Service/Rates**
24. What is the appropriate treatment for interruptible arrangements with Industrial Customers? **Settled**
25. Is the classification of wind energy purchases as 100% energy related (as proposed by Hydro) appropriate? **System Operations and Planning/Cost of Service**
26. Is the use of the forecast 2015 load appropriate for rate-setting purposes? **Cost of Service/Rates**
27. Should the cost of service study be adjusted to reflect production and costs consistent with Vale's and Praxair's full load once fully operational? **Cost of Service/Rates**
28. Should any portion of Holyrood fuel costs be assigned as demand in the cost of service? **System Operations and Planning/Cost of Service/Rates**
29. How should the capacity factor for the Holyrood Plant used in the 2015 cost of service study be calculated? **System Operations/Cost of Service/Rates**

30. What is the appropriate treatment for the costs associated with Corner Brook Pulp and Paper's frequency converter, i.e. should any portion be assigned as common and should there be a reduction in assigned costs if it remains specifically assigned to reflect its performance? **System Planning and Operations**
31. Should the calculation of specifically assigned charges be modified to reflect the time value of money associated with the calculation of capital asset values? **Cost of Service/Rates**
32. What is the appropriate phase-in plan for Island Industrial Customer rates? **Rates**
33. Should the industrial peak in the cost of service be adjusted to reflect any benefit to the system arising from the frequency converter? **System Operations and Planning**
34. What is the appropriate Labrador transmission rate? **Cost of Service/Rates**
35. Are safeguards needed to protect Hydro and customers when there are sudden changes in Island Industrial Customer load? **Rates**

D. Rate Stabilization Plan (RSP)

36. If the Load Variation component of the RSP is maintained, when should the change to allocate based on energy ratios become effective? **Cost of Service/Rates**
37. Should any portion of the money that has accumulated since September 2013 in the segregated load variation component of the Industrial Customers' RSP be transferred to the RSP account of Newfoundland Power? **Cost of Service/Rates**
38. Should there be any change in the method for disposing of the balance in the Hydraulic Production Variation component? **Rates**
39. Should the balance in any RSP account be used to offset rate increases? **Rates**

E. New Deferral and Recovery Mechanisms Proposed

40. Should there be an allocation of CDM costs between Newfoundland Power and Industrial Customers? **Cost of Service/Rates**
41. Is Hydro's proposal to defer and recover over 5 years \$ 1.2 million for transmission "catch-up" work said to be "extraordinary" appropriate? **Operations**
42. Is Hydro's proposed Isolated Systems Energy Supply Cost Variances deferral and recovery mechanism appropriate? **Operations/Finance**
43. Is Hydro's proposed Island Interconnected System Supply Cost Variances deferral and recovery mechanism appropriate? **Operations/Finance**

44. Is Hydro's proposed Holyrood Conversion Factor Variance deferral and recovery mechanism appropriate? **Operations/System Operations and Planning/Finance**
45. Is Hydro's proposed Black Start costs deferral and recovery appropriate? **Operations/Prudence**
46. Is Hydro's proposed 2014 Additional Supply costs deferral and recovery appropriate? **Operations/Prudence**

F. Labrador Interconnected System

47. What is Hydro's test year revenue requirement for this system? i.e. are all proposed costs of the system appropriate? **Operations**
48. Are there any additional revenue requirement implications arising from Hydro's acquisition of Twinco's assets? **Operations**

G. Rural Deficit

49. Is the amount of the Rural Deficit appropriate and is it properly managed by Hydro? **Operations**
50. Is the allocation methodology proposed by Hydro in its Application appropriate? **Cost of Service/Rates**
51. Are Hydro's efforts in relation to energy conservation and customer awareness adequate in the rural areas? **Customer Service**

H. Other

52. Should the supply agreement with Corner Brook Pulp and Paper be reviewed to determine: if it is fair to consumers including CBPP; if it can be made more transparent; and if it is consistent with the CBPP water rights? **Settled**
53. Is Hydro's customer service performance reasonable and if not, why not and what improvements should be made? **Customer Service**
54. Is Hydro's supply reliability performance reasonable and if not, why not, and what measures should be taken to improve supply reliability? **Operations**
55. Management decision making in a matrix organization, including the level of participation in Hydro matters by the CEO. **Policy/HROE**

Dated at St. John's in the Province of Newfoundland and Labrador, this 24th day of August, 2015.

Thomas Johnson, Q.C.
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IN THE MATTER OF the Public
Utilities Act, R.S.N. 1990, Chapter P-47
(the “Act”), and

IN THE MATTER OF a General Rate Application
(the “Amended Application”) by Newfoundland and
Labrador Hydro for approvals of, under Section 70
of the Act, changes in the rates to be charged
for the supply of power and energy to Newfoundland
Power, rural Customers and Industrial Customers; and
under Section 71 of the Act, changes in the Rules and
Regulations applicable to the supply of electricity to
Rural Customers.

**NEWFOUNDLAND POWER INC.’S ISSUES LIST
(August 21, 2015)**

In Newfoundland Power’s submission, the following issues arise in this proceeding:

A. Issues Affecting Return

1. What is the appropriate rate base for 2013, 2014 and 2015 (forecast) including consideration of the impact of any projects found to be imprudent by the Board?
Finance/Prudence
2. Should Hydro’s return be adjusted between rate hearings when Newfoundland Power’s return changes as the result of a Newfoundland Power rate hearing or as the result of the application of an adjustment formula? **Finance**
3. What should be the appropriate method for determining Hydro’s return between rate hearings when Newfoundland Power’s rate of return changes? **Finance**
4. What is the appropriate capital expenditures level to use in setting rate base for test year purposes and determining depreciation? **Operations/Finance**

B. Revenue Requirement Issues

5. What are Hydro’s 2014 and 2015 test year revenue requirements? **Finance**
6. Is the amount proposed for the 2014 Revenue Deficiency of \$45.9 million appropriate for recovery from customers? **Operations/Finance**
7. How should any 2014 approved Revenue Deficiency be recovered? **Rates**
8. Has Hydro provided an adequate explanation of cost increases? **Operations/ Finance**
9. Should a productivity/efficiency allowance be applied to the 2015 revenue requirement?
Operations
10. Are the appropriate internal costs properly capitalized? **Operations/Finance**

11. Exploits Generation – status of arrangement with Government and future expense treatment. **Operations**
12. Are the non-regulated costs properly excluded from the revenue requirement, i.e. are the policies on intercompany charges appropriate and are the amounts included in revenue requirement appropriate? **Finance**
13. Is the vacancy factor properly applied? **HROE**
14. Should Hydro's proposed 2015 test year conversion factor for No. 6 fuel at the Holyrood plant be accepted? **Operations/System Operations and Planning**
15. Should Hydro's proposed 2015 test year No. 6 fuel price be accepted? **System Operations and Planning**
16. Is the debt guarantee fee included in the test year revenue requirement appropriate? **Finance**
17. How should the 2014 and 2015 test year revenue requirements be adjusted to remove costs associated with projects found to be imprudent by the Board? **Prudence**

C. Rates, Rules and Regulations Issues

18. Are the rate designs proposed by Hydro for Newfoundland Power appropriate? **Cost of Service/Rates**
19. Is the proposed amount of the demand charge for Newfoundland Power appropriate? **Cost of Service/Rates**
20. What is the appropriate treatment of Newfoundland Power's curtailable load in Hydro's cost of service Study? **Cost of Service**
21. Does Newfoundland Power's load factor in Hydro's cost of service study need to be adjusted? **Cost of Service/Rates**
22. Is the capacity factor used for wind energy projects in the cost of service appropriate? **System Operations and Planning/Cost of Service**
23. Should any portion of Holyrood fuel costs be assigned as demand in the cost of service? **System Operations and Planning/Cost of Service**
24. How should the capacity factor for the Holyrood Plant used in the 2015 cost of service study be calculated? **System Operations and Planning/Cost of Service**
25. Should the load forecast be adjusted to reflect Vale's and Praxir's full load once fully operational? **Cost of Service**
26. Should the calculation of specifically assigned charges be modified to reflect the time value of money associated with the calculation of capital asset values? **System Operations and Planning**
27. What is the appropriate treatment for the costs associated with Corner Brook Pulp and Paper's frequency converter, i.e. should any portion be assigned as common and should

there be a reduction in assigned costs if it remains specifically assigned to reflect its performance? **System Operations and Planning/Cost of Service**

28. Should the industrial peak in the cost of service be adjusted to reflect any benefit to the system arising from the frequency converter? **System Operations and Planning**

D. Rate Stabilization Plan

29. If the Load Variation component of the RSP is maintained, when should the change to allocation based on energy ratios become effective? **Cost of Service/Rates**
30. Should any portion of the Industrial Customers' segregated load variation balance that has accumulated since September 2013 be transferred to Newfoundland Power's account? **Cost of Service/Rates**
31. Should there be any change in the method for disposing of the balance in the Hydraulic Production Variation component? **Rates**
32. Should the balance in any RSP account be used to offset rate increases? **Rates**
40. How should CDM costs be allocated between Newfoundland Power and Industrial Customers? **Cost of Service/Rates**

E. Deferral and Recovery Mechanisms

33. Is Hydro's proposal to defer and recover over 5 years \$ 1.2 million for transmission "catch-up" work said to be "extraordinary" appropriate? **Operations/Finance**
34. Is Hydro's proposed Isolated Systems Energy Supply Cost Variances deferral and recovery mechanism appropriate? **Operations/Finance**
35. Is Hydro's proposed Island Interconnected System Supply Cost Variances deferral and recovery mechanism appropriate? **Operations/Finance**
36. Is Hydro's proposed Holyrood Conversion Factor Variance deferral and recovery mechanism appropriate? **System Operations and Planning/Finance**
37. Is Hydro's proposed Black Start costs deferral and recovery appropriate? **Prudence**
38. Is Hydro's proposed 2014 Additional Supply costs deferral and recovery appropriate? **Prudence**

39. F. Rural Deficit

40. Is the amount of the Rural Deficit appropriate and is it properly managed by Hydro? **Operations**
41. Is the new allocation methodology for the Rural Deficit proposed by Hydro in its Application appropriate? **Cost of Service/Rates**

G. Other

42. Is Hydro's supply reliability performance reasonable and, if not, why not, and what measures should be taken to improve supply reliability? **Operations**
43. Management decision-making in a matrix organization. **Policy/HROE**
44. Issues arising from the Evidence and Issues Lists of other Intervenors and the Board's Staff as they may affect or impact Newfoundland Power or its customers.

DATED at St. John's, Newfoundland and Labrador, this 21st day of August, 2015.

NEWFOUNDLAND POWER INC.

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IN THE MATTER OF the Public Utilities Act, R.S.N. 1990, Chapter P-47 (the “Act”), and

IN THE MATTER OF a General Rate Application (the “Amended Application”) by Newfoundland and Labrador Hydro for approvals of, under Section 70 of the Act, changes in the rates to be charged for the supply of power and energy to Newfoundland Power, rural Customers and Industrial Customers; and under Section 71 of the Act, changes in the Rules and Regulations applicable to the supply of electricity to Rural Customers.

REVISED ISSUES LIST OF THE ISLAND INDUSTRIAL CUSTOMERS GROUP

- i) All matters addressed by the Pre-Filed Testimony of P. Bowman and H. Najmidinov including, specifically,:
 - a) Holyrood conversion factor; **Operations/System Operations and Planning**
 - b) Average Cost of Capital; **Finance**
 - c) NP Rate Design; **Cost of Service/Rates**
 - d) Stabilization of Power Supply Cost Variables; **Operations/Rates**
 - e) RSP Load Variation; **Rates**
 - f) CBPP Frequency Converter Cost of Service Treatment; **System Operations and Planning/Cost of Service**
 - g) CBPP Frequency Converter Capital Cost and Rate Base; **Operations/System Operations and Planning**
 - h) IC Peak Demand; **Operations**
 - i) CDM Cost Responsibility; **Cost of Service/Rates**
 - j) Holyrood Classification in Cost of Service; **System Operations and Planning/Cost of Service**
 - k) Holyrood Fuel Price; **System Operations and Planning**
 - l) Demand Cost Responsibility in the COS including NP Loads and Load Factor and NP Curtailable; **System Operations and Planning/Cost of Service**
 - m) Impacts of Transitional Industrial Customers; and **Cost of Service/Rates**
 - n) Hydro’s Capital Structure and Return on Rate Base. **Finance**

- ii) Matters of Revenue Requirement generally, including productivity/efficiency allowance, vacancies, intercompany charges and the Exploits power supplies. **Operations/Finance**
- iii) Prudence, and inclusion of capital spending in Revenue Requirement. **Prudence**
- iv) Proposals for new deferral mechanisms, including extraordinary transmission work, Holyrood Black Start costs, Holyrood conversion factor, and system supply cost variance. **Operations**
- v) Cost recovery for Capacity Assistance Agreements. **System Operations and Planning**
- vi) Cost recovery for GRA amounts. **Finance**
- vii) The appropriate classification (demand and energy) of wind in Hydro's Cost of Service study. **System Operations and Planning/Cost of Service**
- viii) Hydro's proposed inclusion of the Debt Guarantee Fee in rates. **Finance**
- ix) Hydro's Rate Stabilization Plan, including balances, methods of calculation and operation of the fund from September 2013 onwards. In particular; **Rates**
 - a) The future need for the components of the Plan, including in particular the Load Variation component;
 - b) The calculation of interest credited to the plan for balances since September 2013 that were scheduled to be paid out at an earlier date (per OIC); and
 - c) The allocation and use of accrued balances for the purposes of GRA rate stabilization.
- x) Allocation of CDM expenses to the various customer classes. **Cost of Service**
- xi) Any adjustments to the 2015 Load Forecast for Revenue Requirement or Cost of Service purposes. **Cost of Service**
- xii) The proposed phase-in of Industrial Customer rates. **Rates**
- xiii) Any updates to Hydro's 2015 Test Year Forecast. **Finance**
- xiv) Recovery of any 2014 revenue deficiency. **Rates**
- xv) Matters associated with the CBPP and Deer Lake Power supply arrangement. **Settled**
- xvi) Issues which arise from the evidence and Issues Lists of other Intervenors in so far as they may impact the Island Industrial Customers Group.

The Island Industrial Customers reserve the right to adjust, revise and/or amend the above noted Issues List as the within Application progresses and to exclude any issue addressed by settlement prior to the time of examination at the hearing.

DATED at Corner Brook, in the Province of Newfoundland and Labrador, this 25th day of August, 2015.

POOLE ALTHOUSE

Per: _____
Dean A. Porter

STEWART MCKELVEY

Per: _____
Paul L. Coxworthy

Issues Affecting the Innu Nation

Policy and Overview

- Is there need for a policy concerning the cost implications of transmission upgrades required to provide service to unregulated customers? **System Operations and Planning**
- Should the Board indicate how the costs of the Labrador West Transmission Project will be allocated, if and when it is completed? **System Operations and Planning**
- Are Hydro's efforts at energy conservation and efficiency and customer awareness adequate in the rural areas? **Customer Service**
- Does Hydro have an adequate focus/effort on renewable energy options, in particular medium-term options? **System Operations**
- Should the Board approve a wheeling rate? **Rates**
- Provision of service to customers in Natuashish **Operations**
- Should the Board institute an Integrated Resource Planning process for Hydro? **System Operations and Planning**

Operations

- Labrador West transmission (Twinco assets) **Operations**
- Management of the rural deficit (including applicability to L'Anse au Loup) **Operations**
- Operating expenses (esp. re isolated systems) **Operations**
- Reliability (re isolated systems) **Operations/System Operations and Planning**
- Provision of services to customers in Natuashish **Operations**

System Operations and Planning

- Load forecasts (esp. re isolated systems, and Labrador East and West) **System Operations and Planning**
- System planning (esp. re isolated systems) **System Operations and Planning**
- Renewables in isolated systems **System Operations and Planning**

Cost of Service

- Rural deficit methodology **Cost of Service/Rates**
- Labrador West vs Labrador East issues **Cost of Service/Rates**

Finance

- Calculation of rate base **Finance**
- GRA and regulatory costs **Finance**

Customer Service and CDM

- CDM in Labrador East and in isolated systems **Customer Service**

Rates

- Hydro rural rates **Rates**
- Regulatory outlook (future studies) **Rates**
- Should there be a fixed date for Hydro's next GRA or should the Board order Hydro to file its next GRA in 2017 for rates in 2018? **Rates**
- Should the Board order Hydro to carry out studies of marginal costs, cost of service, rate design and the RSP and other supply cost variance mechanisms according to a time-bound plan prior to filing its next GRA? **Rates**
- Should the Board institute an Integrated Resource Planning process for Hydro? **System Operations and Planning**
- Is the proposed methodology for setting the Labrador transmission rate appropriate? **Rates**
- Is there need for a policy concerning the cost implications of transmission upgrades required to provide service to unregulated customers? **Rates**
- What is the appropriate Labrador Transmission rate? **Rates**
- Should there be a rate rider to reflect an adjustment in the capital costs assignment between Labrador East and Labrador West? **Rates**
- Should the Board indicate how the costs of the Labrador West Transmission Project will be allocated, if and when it is completed? **Rates**
- Is it reasonable/appropriate to implement the deferred 2007 rate increase for domestic and general service customers in isolated diesel areas at this time? **Rates**

All of which is respectfully submitted on behalf of the Innu Nation

Dated at the City of Toronto, in the Province of Ontario, this 17th day of August, 2015

In the Matter of the *Public Utilities Act* R.S.N.L. 1990, Chapter P-47, (the "Act") and the *Electrical Power Control Act*, R.S.N.L. 1994, Chapter E-5.1, (the "EPCA")

In the Matter of a General Rate Application (the "Application") by Newfoundland and Labrador Hydro (the Applicant") dated July 30, 2013 and amended on November 10, 2014

Issues List of the Nunatsiavut Government

- 1 Given the unique high energy budget factors for Nunatsiavut residents and businesses, are the rates
2 proposed by Hydro unjust, unreasonable or unjustly discriminatory? **Rates**
- 3 Given the economic status of the Nunatsiavut residents and businesses, is any rate increase
4 proposed by Hydro at this time unjust, unreasonable or unjustly discriminator? **Rates**
- 5 Should a rate increase deferred from 2006 be put into effect at all, given the length of time passed
6 since the initial rate increase recommended in 2006. Would a rate increase at this time be unjust,
7 unreasonable and unjustly discriminatory in the circumstances? **Rates**
- 8 Given that energy conservation and efficiency should be the primary focus of Hydro, what efforts
9 have Hydro undertaken on energy conservation and efficiency for Nunatsiavut residents and
10 businesses? **Customer Services**
- 11 Has Hydro undertaken sufficient consumer awareness for the Nunatsiavut residents and
12 businesses? **Customer Services**
- 13 What efforts have Hydro made with respect to renewable energy options for Nunatsiavut residents
14 and businesses. In particular, has Hydro considered medium-term renewable energy options?
System Operations and Planning
- 15 Are the rate designs proposed by Hydro for Nunatsiavut residents and businesses appropriate and
16 in compliance with the Labrador Inuit Land Claims Agreement Act? **Rates**
- 17 Are the rate increases posed by Hydro for the Nunasiavut residents and businesses appropriate and
18 in compliance with the Labrador Inuit Land Claims Agreement Act? **Rates**

1 DATED at St. John's, in the Province of Newfoundland and Labrador, this 8th day of July, 2015.
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7 **Benson Buffett PLC**

8 Solicitors for the

9 Nunatsiavut Government

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15 
16 GENEVIEVE M. DAWSON