

April 13, 2015

Board of Commissioners of Public Utilities
P.O. Box 21040
120 Torbay Road
St. John's, NL
A1A 5B2

Attention: Ms. Cheryl Blundon
Director of Corporate Services & Board Secretary

Ladies and Gentleman:

Re: Newfoundland Power's March 20, 2015 Application
in relation to Phase Two RFIs in the Board's Investigation
and Hearing into Supply Issues and Power Outages

The Consumer Advocate has reviewed and considered Newfoundland Power's March 20, 2015 application and fully support its request that the Board make an Order compelling Hydro to forthwith provide full and adequate responses (including mathematical calculations, design specifications and supporting documents) to NP-NLH - 004, 005 and 018.

The Consumer Advocate regards the information being sought as necessary and relevant to informing the Board and the parties as to important issues before the Board in Phase II of the inquiry. The Consumer Advocate agrees with Newfoundland Power that the information sought will provide evidence relating to the "assessment of risks to reliable electricity supply on the island of Newfoundland". This is a primary focus of Phase II of the investigation. The Consumer Advocate also submits that the production of the information should not place an undue burden on Hydro nor detract from an efficient inquiry process.

We appreciate the opportunity to provide these comments upon Newfoundland Power's Application.

Yours very truly,

O'DEA, EARLE



THOMAS J. JOHNSON, Q.C.

TJJ:sif

- c.c. Geoffrey Young, Newfoundland & Labrador Hydro
- Paul Coxworthy, Stewart McKelvey
- Roberto Frampton Benefiel, Grand Riverkeeper, Labrador Inc.
- Danny Dumaresque
- Gerard Hayes and Ian Kelly, Q.C., Newfoundland Power Inc.