

April 22, 2014

Ms. G. Cheryl Blundon
Board of Commissioners of Public Utilities
120 Torbay Road, P.O. Box 12040
St. John's, NL A1A 5B2

Dear Ms. Blundon:

Re: The Board's Investigation and Hearing into Supply Issues and Power Outages on the Island Interconnected System – Request for Comments – Intervenor Status – Request from the Grand Riverkeeper Labrador, Inc.

This is further to your letter of April 14, 2014 regarding the above-captioned matter.

The Grand Riverkeeper Labrador Inc. wrote the Board on March 30, 2014 requesting permission to become an Intervenor.

Grand Riverkeeper Labrador Inc., according to its website, www.grandriverkeeperlabrador.ca/Policy.html, has as its purpose the following:

The purpose of the Corporation is to preserve and protect the water quality and the ecological integrity of the Grand (Churchill) River and its estuaries and future users and for posterity through actions of public awareness, monitoring, intervention and habitat restoration.

It is the stated hope of Grand Riverkeepers Labrador Inc., in its request to be an Intervenor, that the Board will through its proceedings inquire into and address legal and contractual risks and risks to the physical integrity of the dams and the North Spur natural dam. Grand Riverkeepers Labrador Inc., if granted Intervenor status, states that it intends to present evidence concerning the contractual uncertainties related to water management and physical risks related to the North Spur natural dam.

The understanding of the Consumer Advocate is that the Board in Order No. P.U. 3 (2014) did not plan to inquire into the areas that Grand Riverkeepers Labrador Inc. has identified as being of concern to it. Rather, the Board's Order stated that the issues to be addressed were as set out in Schedule "A" to its Order. Schedule "A" sets out that the Board's Final Report will address, besides an analysis of the events of December, 2013 and January, 2014, an "Evaluation of Island Interconnected system adequacy and reliability up to and after the interconnection with the Muskrat Falls generating facility" including:

- Load forecasting methodologies
- Utility coordination of system operations and load growth planning
- Asset management strategies for generation and transmission assets, including maintenance of the Holyrood Plant and gas turbines
- Adequacy of resources to manage capital and operating programs
- New generation options and the role of conservation and demand management to address load growth until the interconnection, including consideration of possible delays in the interconnection
- Back-up generation and/or alternative supply requirements after interconnection
- Other system planning, capital and operating issue which may impact adequacy and reliability before and after interconnection

In light of these issues to be addressed, the Consumer Advocate does not believe that Grand Riverkeepers Labrador Inc.'s intervention is supported.

The Consumer Advocate notes that Newfoundland Power Inc. wrote the Board on April 14, 2014 in relation to its position on Grand Riverkeepers Labrador Inc.'s intervention. The Consumer Advocate wishes to indicate that he is in agreement with the positions expressed by Newfoundland Power Inc.

Yours very truly,

O'DEA, EARLE



THOMAS JOHNSON

TJ/cel

cc: Newfoundland and Labrador Hydro
Attention: Geoffrey P. Young

Newfoundland Power Inc.
Attention: Gerard Hayes

Stewart McKelvey Stirling Scales
Attention: Mr. Paul Coxworthy

Mr. Danny Dumaresque