

IN THE MATTER OF An Investigation And Hearing  
Into Supply Issues And Power Outages On The  
Island Interconnected System.

**RESPONSE TO NLH LETTER OF 1 OCTOBER 2014**

**Board of Commissioners of Public Utilities  
Prince Charles Building  
120 Torbay Road, P.O. Box 21040  
St. John's, NL  
A1A 562**

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

October 21, 2014

Ms. Blundon:

I am writing in response to your letter of October 21 and to supplement my response dated October 3 to Hydro's letter of October 1.

As you correctly pointed out, the two documents we submitted on September 28 were incorrectly numbered. I apologize for the error.

You will find in attachment a document containing GRK-NLH-58 through -75. These are identical to the RFIs submitted on September 28, incorrectly numbered as GRK-NLH-53 through -70.

As for the second document submitted on September 28, incorrectly numbered as GRK-NLH-71 through -91, in light of the Board's decision in P.U. 41 (2014), GRK respectfully wishes to withdraw these RFIs at this time. GRK reserves the right to return to some of these matters, if appropriate, in follow-up to the responses to RFIs GRK-NLH-43 through -46, allowed by the Board in said decision.

Furthermore, I would like to add to the comments in my letter of October 3 with respect to the contested RFIs GRK-NLH-58 (now renumbered as GRK-NLH-63) and the 2<sup>nd</sup> and 6<sup>th</sup> bullets of GRK-NLH-55 (now renumbered as GRK-NLH-60). Based on our reading of P.U. 41 (2014), this contestation is unfounded.

The two contested bullets in GRK-NLH-60 simply request Hydro's estimate of the probability of forced outages related to the North Spur and to the Water Management Agreement. Regarding the WMA, the Board wrote:

“to the extent that the responses can address consequences regarding the availability of a reliable and adequate supply of power to the Island Interconnected system associated with the risks of the scenarios outlined” (page 23, lines 23-25)

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And regarding the North Spur, the Board wrote:

“Nevertheless, to the extent that the information sought may related to issues associated with the risks to the adequate and reliable supply on the Island Interconnected system and how these risks have been addressed, this information may be relevant.” (p. 26, lines 22-24)

As GRK-NLH-60 speaks directly to the risks to the Island Interconnected system, it should be allowed.

As for GRK-NLH-63, it requests that NLH explain its understanding of contractual provisions it has already tabled as evidence. There is nothing in P.U. 41 (2014) to support Hydro’s request to disallow this RFI.

Finally, GRK respectfully asks that the Board move expeditiously to set a schedule for responses to the RFIs allowed in that decision, given the lengthy delay since the RFIs were initially filed.

Respectfully yours,

(s)

Charles O’Brien

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