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January 12, 2015

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Via Electronic Mail & Courier

Newfoundland and Labrador Board
of Commissioners of Public Utilities
Suite E210, 120 Torbay Road
P.O. Box 21040
St. John's, NL A1A 5B2

**Attention: Ms. G. Cheryl Blundon
Director of Corporate Services and Board Secretary**

Dear Ms. Blundon:

**Re: The Board's Review of Supply Issues and Power Outages on the Island
Interconnected System – Phase I**

We write on behalf of the Island Industrial Customers Group, Corner Brook Pulp and Paper Limited, North Atlantic Refining Limited, and Teck Resources Limited.

We write in relation to the Board's scheduling of today's date as the final date for filing of requests for information in the above matter. We acknowledge that today's date was set as the final date for requests for information to provide the opportunity for the parties and intervenors to review the final report of Liberty Group on Phase I of the above Review, released in December 2014.

We have reviewed the final report of Liberty Group on Phase I (in respect of Newfoundland and Labrador Hydro), and have noted that it makes a number of Recommendations, for implementation by Newfoundland and Labrador Hydro. We understand from the January 7, 2015 meeting of legal counsel for the parties and intervenors in this matter that Newfoundland and Labrador Hydro intends to respond to each of the Liberty Group Recommendations in its submission to be made to the Board. We also understand that it is the Board's expectation that Hydro, in its submission, will clearly state whether, in respect of each Liberty Group Recommendation, it accepts the Recommendation, Hydro's plan for implementation of accepted Recommendations, and Hydro's explanation should it not accept any of the Recommendations.

In light of our understanding of how Hydro will address the Liberty Group Recommendations in its submission, and of our view that the Phase I Review should be completed in the most expeditious manner consistent with a thorough review of the issues, we do not believe the filing of further requests for information by the Island Industrial Customers Group would serve a necessary purpose. Having said this, the Island Industrial Customers Group wish to make clear that it is their expectation that Hydro's submissions will fully and unambiguously address all of the Liberty Group Recommendations, and where appropriate (such as, for example, Recommendations 9.1, 9.2 and 9.3) will specifically address issues of concern to its industrial customers.

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However, should it appear that Hydro has not sufficiently addressed the Liberty Group Recommendations in its submissions, we believe it would then be reasonable to expect that there would be afforded to the parties and intervenors the opportunity to make their own submissions regarding by what process any insufficient responses by Hydro should be addressed.

We trust this is in order.

Yours truly,

Stewart McKelvey



Paul Coxworthy

PLC/kmcd

- c. Mr. Geoffrey P. Young, Senior Legal Counsel, Newfoundland and Labrador Hydro
- Mr. Thomas J. Johnson, Consumer Advocate
- Mr. Gerard Hayes, Newfoundland Power
- Mr. Dean A. Porter, Poole Althouse
- Mr. Ian F. Kelly Q.C., Curtis, Dawe
- Mr. Peter Alteen, Newfoundland Power
- Mr. William Kennedy, Mr. William S. Kennedy Law Office
- Mr. Danny Dumaresque
- Ms. Maureen P. Greene Q.C., Newfoundland and Labrador Board of Commissioners of Public Utilities
- Ms. Jacqueline Glynn, Newfoundland and Labrador Board of Commissioners of Public Utilities
- Mr. David MacDougall, McInnes Cooper
- Mr. Charles O'Brien
- Mr. Roberta Benefiel