



GRAND RIVERKEEPER® LABRADOR INC.



Box 569, Station B
Happy Valley-Goose Bay, Labrador
NL A0P 1E0
Telephone: 709-896-4164 or 709-987-9414

July 17, 2014

Board of Commissioners of Public Utilities
Prince Charles Building
12 Torbay Rd. P. O. Box 21040
St. John's, NL A1A 5B2

Mr. Gerald Hayes, Newfoundland Power, Inc.
Ian Kelly, QC
Mr. Thomas Johnson, Consumer Advocate
Ms. Colleen Lacey
Mr. Paul Coxworthy, Island Industrial Customer Group
Mr. Dean Porter
Mr. Danny Dumaresque
Mr. Geoffrey P. Young, Newfoundland and Labrador Hydro
Ms. Cheryl Blundon, Director Corporate Services & Board Secretary, PUB
Mr. Philip Raphals, Helios Centre
Mr. Charles O'Brien

In the Matter of An Investigation And Hearing Into Supply Issues and Power Outages On The Island Interconnected System:

RE: (i) Request by attorney Charles O'Brien (member of the Quebec Bar) to appear on behalf of GRAND RIVERKEEPER LABRADOR, INC. (GRK)

(ii) Proposal by GRK that the determination of Newfoundland and Labrador Hydro's Motion to Strike Requests for Information to be heard on August 26, 2014 be conducted as a paper hearing.

Dear Ms. Blundon and Participants:

Please find attached a letter from our attorney Charles O'Brien regarding the above referenced items.

Signed copies of this and Mr. O'Brien's correspondence will follow by regular mail.

Your consideration and comments will be very much appreciated!

Sincerely,

Roberta Frampton Benefiel, Vice President

Grand Riverkeeper Labrador, Inc.

IN THE MATTER OF the *Public Utilities Act*, RSN 1990, Chapter P-47 (the "Act"); and

IN THE MATTER OF a General Rate Application (the 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.

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

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

LETTER RE: APPEARANCE, REQUESTS FOR INFORMATION AND MOTION TO STRIKE

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

Re: The Board's Investigation and Hearing into Supply Issues and Power Outages on the Island Interconnected System — Notice of Motion regarding Requests for Information.

(i) Request by attorney Charles O'Brien (member of the Quebec Bar) to appear on behalf of GRAND RIVERKEEPER LABRADOR INC. (GRK); and

(ii) Proposal by GRK that the determination of Newfoundland and Labrador Hydro's Motion to Strike Requests for Information to be heard on August 26, 2014 be conducted as a paper hearing.

Dear Ms. Blundon:

We have been asked by Roberta Frampton Benefiel to represent GRK in this matter, and seek the Board's permission. The undersigned has been a member of the Quebec Bar in good standing since 1991, but is not a member of the Newfoundland and Labrador Bar. The undersigned has BCL and LLB degrees from McGill University as well as a Master's degree in Environmental Legal studies from the Environmental Law Center of Vermont Law School. The undersigned represented an Environmental Coalition before the Quebec Energy Board from 1998 to 2002.

As GRK has indicated previously, it intends to ask that its costs be reimbursed, should the Board find that its involvement and that of its attorney and experts in the proceeding has been of assistance to the Board. GRK will make every effort to keep its costs to a minimum.

To that end, we request that the Hearing currently scheduled for August 26th 2014 be conducted as a paper hearing rather than including representations made orally before the Board.

Should such an approach be acceptable, we are willing to comply with the Board's instructions in this regard and will do so within the shortest of delays.

A paper hearing of the Motion will expedite matters and reduce costs, in particular travel expenses.

Yours very truly,

Charles O'Brien
Member of the Quebec Bar

DATED at Montreal, in the Province of Quebec, this 16th day of July, 2014

Ecc. **Newfoundland Power Inc.**

Mr. Gerald Hayes, E-mail: ghayes@newfoundlandpower.com

Ian Kelly, QC, E-mail: ikelly@curtisdawe.com

Consumer Advocate

Mr. Thomas Johnson, E-mail: tjohnson@odeaearl.ca

Ms. Colleen Lacey, E-mail: clacey@odeaearle.ca

Island Industrial Customer Group

Mr. Paul Coxworthy, E-mail: pcoxworthy@stewartmckelvey.com

Mr. Dean Porter, E-mail: dporter@pa-law.ca

Mr. Danny Dumaresque

Mr. Danny Dumaresque, E-mail: danny.liberal@gmail.com

Newfoundland and Labrador Hydro

Mr. Geoffrey P. Young, E-mail: gyoung@nlh.nl.ca