

Our File: 115064

January 22, 2015

The Board of Commissioners of Public Utilities
Prince Charles Building
120 Torbay Road, PO Box 21040
St. John's, Newfoundland & Labrador A1A 5B2

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

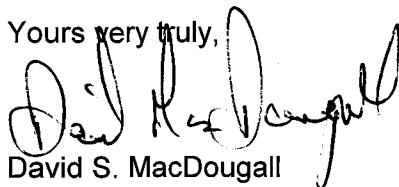
Dear Ms. Blundon:

Re: The Board's Investigation and Hearing into Supply Issues and Power Outages on the Island Interconnected System ("Public Review") – Motion by the Grand Riverkeeper Labrador, Inc. ("GRK") to Order Complete Responses to Requests for Information ("RFIs") Posed to Newfoundland and Labrador Hydro ("Hydro")

We are counsel for Hydro. With respect to the above noted Motion matter Hydro is in receipt of the GRK's reply submission dated January 21, 2015. Hydro notes that the Motion deals with the responsiveness by Hydro to certain RFIs previously posed by the GRK. Now in its reply submission the GRK has in paragraphs 8 and 30 posed further RFIs 93-96 and 97-98 respectively to Hydro. In the RFI package filed with the submission the GRK also includes RFIs 99-100. Hydro submits that it is completely inappropriate as part of the GRK's reply submission for the GRK to pose further RFIs. This was not provided for by the Board in its directions regarding this matter and no further RFI stage in the Public Review process has been set by the Board.

Hydro submits that for the purposes of this Motion process the Board should disregard the newly filed GRK RFIs NLH-93-100. If at some point following the determination of the Motion the Board allows for further RFIs then the GRK would presumably be entitled to file these RFIs at that time, but Hydro notes that it may well seek to have these RFIs struck for being out of scope of the Public Review if the GRK is permitted to pose these at a future time.

All of which is respectfully submitted.

Yours very truly,

David S. MacDougall

cc: Interested Parties

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