

September 26, 2014

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

Attention: Ms. Cheryl Blundon
Director 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**

Reference is made to the following recent correspondence from the Board:

- E-mail dated September 9, 2014, advising parties that they could issue further RFIs by September 24, 2014 with a response due by October 15, 2014; and
- Letter dated September 16, 2014, enclosing RFIs PUB-NLH-438 to PUB-NLH-449 with a response due by October 15, 2014.

In each communication, the Board provided Hydro the opportunity to request an extension to file a response. Hydro is required to request this extension by Friday, September 26, 2014.

Together with the 12 additional RFIs issued by the Board, Hydro has also received 35 additional RFIs from Newfoundland Power, 10 additional RFIs from the Industrial Customers, 14 additional RFIs from the Consumer Advocate and 22 additional RFIs from Mr. Dumarseque, for a total of 93 additional RFIs.

Hydro is also continuing to work diligently to complete 59 outstanding Board RFIs from the prior round of RFIs, some of which are due by September 29 and the remainder of which are due October 10.

Hydro recognizes and respects the role of the Board and Intervenors and is committed to providing timely information, however Hydro respectfully submits that October 15 does not provide sufficient time to prepare and submit full responses to the 93 RFIs that have been asked in this latest round. Hydro requires time to perform analysis and gather data to respond to the questions followed by internal review to ensure that the responses provide thorough answers to the questions.

Many of the 93 RFIs provided are of a very detailed nature and will require those responding to collaborate on groups of questions to ensure that full responses are provided. In particular, the RFIs posed by Newfoundland Power are very detailed and will require additional time in order to respond.

Hydro is also required and committed to file the following reports to the Board in relation to the public inquiry during this same period. Resources required to work on some RFIs are also required to work on these reports for the Board:

Board Reporting	Due Date
Status Update – Generation Winter Readiness	October 1, 2014
Project Update – New CT	October 10, 2014
Project Update – SSD Transformer	October 10, 2014
Project Update – WAV Transformer	October 10, 2014
Annual Work Plan Update	October 15, 2014
Status Update – NLH Capital Projects	October 15, 2014
Status Update – Interruptible Loads	October 15, 2014
Status Update – Critical Spares	October 15, 2014
Integrated Action Plan Update	October 17, 2014

Finally, Hydro notes that many of these additional RFIs deal with long term operational and reliability issues. Hydro recognizes and supports the Board's desire for a timely conclusion to this public inquiry. However, Hydro is also concerned that the resources needed to answer these questions require Hydro to call upon internal resources that are involved in completing activities to ensure Hydro's facilities are ready for this coming winter.

After consultation with staff, and in considering resourcing requirements for this upcoming work and the required analysis for each question, Hydro is therefore requesting extensions of time for these RFIs as follows:

On or before October 22, 2014 the following RFI responses will be submitted:

PUB-NLH-438 to PUB-NLH-449
CA-NLH-57 to CA-NLH-70
IC-NLH-012 to IC-NLH-021
DD-NLH-091 TO DD-NLH-112

On or before November 7, 2014 the following RFI responses will be submitted:

NP-NLH-001 to NP-NLH-035

Hydro reiterates its commitment to providing reliable service to its customers and its commitment to this very important process.

In summary, Hydro has sustained its primary focus on the important task of completing the work required to have its assets ready to reliably meet customer demand for the upcoming winter season. The nature of the questions asked and the responses required necessitates that Hydro tap into the knowledge of its engineers, maintenance and operational staff. These same experienced and knowledgeable staff members are also concurrently maintaining and improving Hydro's system.

Hydro notes that its staff has been working diligently to provide timely responses to RFIs and reporting as required by the Board. Hydro submits that a balance must be struck between ensuring that Hydro's winter readiness targets are met in 2014 while fully responding to the Board's questions and reporting requirements. The extensions requested will allow Hydro the opportunity to fully answer the RFIs while meeting its other important priorities in this regard.

Hydro respectfully requests that the deadlines be extended for filing RFI responses as noted above. Hydro is pleased to discuss this matter further with the Board as may be necessary to ensure successful conclusion of this inquiry process.

Yours truly,

NEWFOUNDLAND AND LABRADOR HYDRO



Geoffrey P. Young
Senior Legal Counsel

GPY/cp

cc: Gerard Hayes – Newfoundland Power
Paul Coxworthy – Stewart McKelvey Stirling Scales
ecc: Roberta Frampton Benefiel – Grand Riverkeeper Labrador

Thomas Johnson – Consumer Advocate
Danny Dumaresque