

August 28, 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 Interconnection System**

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

- Letter dated August 22, 2014, enclosing RFIs PUB-NLH-231 to PUB-NLH-300 due September 12, 2014; and
- Letter dated August 25, 2014, enclosing RFIs PUB-301 to PUB-437 due September 15, 2014.

In each letter, the Board states that "[i]f Hydro determines that it cannot meet the response date for any of these RFIs, Hydro must advise the Board and provide an explanation as to why it cannot respond to each RFI for which it is requesting an extension to file a response." Hydro is required to request this extension by Thursday, August 28, 2014.

Hydro recognizes and respects the role of the Board and is committed to providing timely information however Hydro respectfully submits that a three-week period does not provide sufficient time to prepare and submit full responses to the 207 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.

Hydro will provide responses to as many as it can by September 15, 2014. However, due to the time required and volume of RFIs, Hydro commits to provide responses by September 23, 2014, September 29 and October 10, 2014 as detailed below. Although some extensions have been requested, Hydro will always ensure that the information is provided. That responsibility is taken seriously.

To put this timeline in context, the Board previously provided Hydro with four weeks to respond to the 113 Intervenor RFIs between the period June 27, 2014 and July 25, 2014. Many of the 207 questions provided by the Board in the past week are of a more investigative nature than the

Intervenor RFIs were and will require Hydro employees to collaborate on groups of questions to ensure that full responses are provided. To that end, Hydro is proposing that it should be given at least as much time to respond to these new RFIs as was provided during the Intervenor RFI round.

It should also be noted that Hydro is 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:

<b>Board Reporting</b>	<b>Due Date</b>
Generation Availability Plan	August 29, 2014
Project Update - New CT	August 29, 2014
Project Update - SSD Transformer	August 29, 2014
Project Update - WAV Transformer	August 29, 2014
Response to Board Letter of August 27, 2014 requiring certain dates and documents	September 3, 2014
Project Update - New CT	September 12, 2014
Project Update - SSD Transformer	September 12, 2014
Project Update - WAV Transformer	September 12, 2014
Annual Work Plan Update	September 15, 2014
Status Update - NLH Capital Projects	September 15, 2014
Status Update - Interruptible Loads	September 15, 2014
Status Update - Critical Spares	September 15, 2014
Integrated Action Plan Update	September 26, 2014
Project Update - New CT	September 26, 2014
Project Update - SSD Transformer	September 26, 2014
Project Update - WAV Transformer	September 26, 2014
Status Report – Winter Readiness	October 1, 2014

Finally, Hydro notes that questions in these two batches of RFIs deal primarily 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. Hydro is of the view that the RFIs involving these resources be given the longest lead-time for response.

After consultation with staff, and in considering resourcing requirements for this upcoming work, the required analysis for each question and various staff leaves, Hydro is therefore requesting extensions of time for the 207 RFIs as follows:

**On or before September 23, 2014 the following 141 will be submitted:**

PUB-NLH-231	PUB-NLH-257	PUB-NLH-284
PUB-NLH-232	PUB-NLH-258	PUB-NLH-285
PUB-NLH-233	PUB-NLH-261	PUB-NLH-286
PUB-NLH-234F	PUB-NLH-262	PUB-NLH-288
PUB-NLH-235	PUB-NLH-263	PUB-NLH-289
PUB-NLH-237	PUB-NLH-264	PUB-NLH-290
PUB-NLH-238	PUB-NLH-265	PUB-NLH-291
PUB-NLH-239	PUB-NLH-266	PUB-NLH-292
PUB-NLH-240	PUB-NLH-268	PUB-NLH-293
PUB-NLH-242	PUB-NLH-269	PUB-NLH-294
PUB-NLH-243	PUB-NLH-270	PUB-NLH-295
PUB-NLH-244	PUB-NLH-271	PUB-NLH-296
PUB-NLH-245	PUB-NLH-272	PUB-NLH-297
PUB-NLH-246	PUB-NLH-273	PUB-NLH-298
PUB-NLH-247	PUB-NLH-274	PUB-NLH-299
PUB-NLH-248	PUB-NLH-275	PUB-NLH-300
PUB-NLH-249	PUB-NLH-276	PUB-NLH-301
PUB-NLH-250	PUB-NLH-277	PUB-NLH-302
PUB-NLH-251	PUB-NLH-278	PUB-NLH-304
PUB-NLH-252	PUB-NLH-279	PUB-NLH-305
PUB-NLH-253	PUB-NLH-280	PUB-NLH-306
PUB-NLH-254	PUB-NLH-281	PUB-NLH-307
PUB-NLH-255	PUB-NLH-282	PUB-NLH-308
PUB-NLH-256	PUB-NLH-283	PUB-NLH-309

PUB-NLH-310	PUB-NLH-358	PUB-NLH-406
PUB-NLH-311	PUB-NLH-360	PUB-NLH-407
PUB-NLH-312	PUB-NLH-368	PUB-NLH-408
PUB-NLH-315	PUB-NLH-369	PUB-NLH-409
PUB-NLH-316	PUB-NLH-370	PUB-NLH-410
PUB-NLH-317	PUB-NLH-371	PUB-NLH-411
PUB-NLH-318	PUB-NLH-381	PUB-NLH-414
PUB-NLH-319	PUB-NLH-382	PUB-NLH-415
PUB-NLH-321	PUB-NLH-383	PUB-NLH-416
PUB-NLH-325	PUB-NLH-387	PUB-NLH-417
PUB-NLH-327	PUB-NLH-389	PUB-NLH-418
PUB-NLH-328	PUB-NLH-390	PUB-NLH-419
PUB-NLH-329	PUB-NLH-391	PUB-NLH-421
PUB-NLH-331	PUB-NLH-394	PUB-NLH-424
PUB-NLH-332	PUB-NLH-395	PUB-NLH-425
PUB-NLH-336	PUB-NLH-398	PUB-NLH-430
PUB-NLH-342	PUB-NLH-399	PUB-NLH-431
PUB-NLH-343	PUB-NLH-400	PUB-NLH-432
PUB-NLH-344	PUB-NLH-401	PUB-NLH-433
PUB-NLH-345	PUB-NLH-402	PUB-NLH-434
PUB-NLH-346	PUB-NLH-403	PUB-NLH-435
PUB-NLH-347	PUB-NLH-404	PUB-NLH-436
PUB-NLH-350	PUB-NLH-405	PUB-NLH-437

**On or before September 29, 2014 the following 19 will be submitted:**

PUB-NLH-287	PUB-NLH-339	PUB-NLH-393
PUB-NLH-303	PUB-NLH-341	PUB-NLH-396
PUB-NLH-313	PUB-NLH-359	PUB-NLH-397
PUB-NLH-320	PUB-NLH-386	PUB-NLH-412
PUB-NLH-322	PUB-NLH-388	PUB-NLH-413
PUB-NLH-323	PUB-NLH-392	PUB-NLH-420
PUB-NLH-338		

**On or before October 10, 2014 the following 47 will be submitted:**

PUB-NLH-236	PUB-NLH-340	PUB-NLH-366
PUB-NLH-241	PUB-NLH-348	PUB-NLH-367
PUB-NLH-259	PUB-NLH-349	PUB-NLH-372
PUB-NLH-260	PUB-NLH-352	PUB-NLH-373
PUB-NLH-267	PUB-NLH-353	PUB-NLH-374
PUB-NLH-313	PUB-NLH-354	PUB-NLH-375
PUB-NLH-323	PUB-NLH-355	PUB-NLH-376
PUB-NLH-324	PUB-NLH-356	PUB-NLH-377
PUB-NLH-326	PUB-NLH-357	PUB-NLH-378
PUB-NLH-330	PUB-NLH-361	PUB-NLH-379
PUB-NLH-333	PUB-NLH-362	PUB-NLH-380
PUB-NLH-334	PUB-NLH-363	PUB-NLH-384
PUB-NLH-335	PUB-NLH-364	PUB-NLH-385
PUB-NLH-337	PUB-NLH-365	PUB-NLH-422

PUB-NLH-423

PUB-NLH-427

PUB-NLH-429

PUB-NLH-426

PUB-NLH-428

Hydro will continue to keep the Board informed of its progress and as indicated, will file any that can be filed earlier than the proposed date.

Hydro would also reiterate its commitment to providing reliable service to its customers and its commitment to this very important process. This has been demonstrated in its responses to date which includes the following: To date, Hydro has answered 233 RFIs from the PUB, 114 RFIs from Intervenor, and has filed a motion to challenge 97 further RFIs that it considers outside the scope of this public inquiry. In addition to responding to these RFIs, throughout the summer period Hydro staff members met extensively, in person, with Liberty Consulting. Hydro has also filed an integrated action plan as well as subsequent reports, as required, on seven occasions since June along with a commitment to provide monthly updates on the Integrated Action Plan and bi-weekly reports on the status of capital projects.

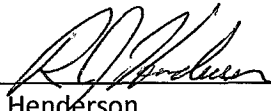
Of course, there have also been a large number of RFIs responses filed by Hydro in other related applications during this period.

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.

Regards,

  
\_\_\_\_\_  
R. J. Henderson  
Vice President  
Newfoundland and Labrador Hydro

RJH/cp

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

Thomas Johnson – Consumer Advocate  
Danny Dumaesque