

April 16, 2014

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

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

Ladies & Gentlemen:

Re: **The Board's Investigation and Hearing into Supply Issues and Power Outages on the Island Interconnected System – Request for Comments – Intervenor Status Request from the Grand Riverkeeper Labrador, Inc.**

This is further to your letter of April 14th, 2014 regarding this matter.

Grand Riverkeeper Labrador, Inc.'s ("Grand Riverkeeper") request of March 30th, 2014 appears to be substantially focussed on risks associated with Nalcor's Muskrat Falls development.

In Order No. P.U. 3 (2014), the Board indicated that Island Interconnected System adequacy and reliability *after* the interconnection of the Muskrat Falls generating facility was an issue to be considered in its Investigation.

Newfoundland Power does not believe that this issue can, or should, be extended to the construction, legal, contractual and physical risks associated with Nalcor's Muskrat Falls development as Grand Riverkeeper's March 30th, 2013 letter indicates. For example, evidence concerning contractual uncertainties related to water management at Muskrat Falls will not meaningfully inform the consideration of Island Interconnected System reliability following the interconnection. Such evidence will certainly have the capability to complicate the Board's consideration of post-Muskrat Falls reliability on the Island of Newfoundland.

The issues raised by Grand Riverkeeper in its request of March 30th, 2014 do not appear to support the Board's granting of Intervenor status in the Investigation.

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We trust the foregoing is found to be in order.

Yours very truly,



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