

DELIVERED BY HAND

August 27, 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 (the "Investigation") – Comments on Newfoundland and Labrador Hydro ("Hydro") Motion**

This is further to the Board's letter of August 15th, 2014 setting August 29th, 2014 as the deadline for comments on Hydro's motion to strike certain requests for information ("RFIs") filed by Mr. Danny Dumaresque and Grand Riverkeeper Labrador, Inc.

In its Notice of Motion dated July 7th, 2014 (the "Notice of Motion"), Hydro submits that the RFIs to which it objects are outside the scope of the Investigation, and sets out specific grounds for objection for individual RFIs. Newfoundland Power has considered the matter, and, except as noted below, is in agreement with Hydro's submissions.

In paragraph 18 of the Notice of Motion, Hydro objects to a number of RFIs on the basis that they are "all referable to the option of constructing a tunnel for the [Strait of Belle Isle] crossing." It is not apparent to Newfoundland Power, however, that Hydro's stated objection is applicable to DD-NLH-73, which requests information on the life of HVDC cables.

In Newfoundland Power's view, the information requested in DD-NLH-73 may be relevant to an "analysis of the adequacy and reliability of the system after the commissioning of the Muskrat Falls generating facility and the Labrador Island link" as contemplated by the Board in Order No. P.U. 15(2014).

We trust the foregoing is found to be in order.

Yours very truly,



Gerard M. Hayes
Senior Counsel

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