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SENT VIA E-MAIL

Cheryl Blundon
Board Secretary
Board of Commissioners of Public Utilities
P.O. Box 21040, St. John's, NL A1A 5B2

Dear Ms Blundon:

Re: 2017 General Rate Application of Newfoundland and Labrador Hydro, Hydro Objections to Requests for Information of the Consumer Advocate, Round #1

Per the Board's correspondence of October 20, 2017, we wish to comment briefly on behalf of the Labrador Interconnected Group regarding Hydro's objections to certain requests for information posed by the Consumer Advocate.

We agree with the submissions of the Consumer Advocate regarding the relevance of the questions that it has posed.

We agree with the Consumer Advocate in its correspondence of October 17, 2017, in which it defined relevance as "applying to the matter in question". The matter in question in this proceeding is whether the costs and rates for which Hydro is applying are just and reasonable, and the questions posed by the Consumer Advocate apply to this question.

Hydro's objection to these RFIs seem to centre on the degree of relevance to the proceeding. It is admittedly the case that some facts are more relevant to that matter than others. While Hydro is aware of those facts, and may have views on the degree of relevance of those facts. However, the parties and the Board are not aware of those facts and are trying to seek those facts through the requests for information process.

The disclosure of those facts to the Board and the parties is precisely the purpose of the RFIs. Ultimately it is for the Board, to make its own determination of how relevant a particular fact is after being apprised of those facts through the evidentiary process, including the requests for information process.

Please be in touch should you have any questions regarding the enclosed.

Yours truly,
Olthuis Kleer Townshend LLP



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