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HAND DELIVERED

October 27, 2017

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

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

Ladies and Gentlemen:

**Re: Newfoundland and Labrador Hydro – 2017 General Rate Application – Requests for Information by the Consumer Advocate**

By letter dated October 19, 2017, Newfoundland and Labrador Hydro (“Hydro”) submitted that it should not be required to respond to certain Requests for Information (“RFIs”) issued by the Consumer Advocate in relation to Hydro’s 2017 General Rate Application (the “GRA”). By letter dated October 20, 2017, the Board set today as the deadline for comments from parties other than the Consumer Advocate. The Consumer Advocate provided comments on the matter on October 25, 2017 (the “Consumer Advocate’s Submission”). This letter provides Newfoundland Power’s comments.

The RFIs numbered CA-NLH-007 and CA-NLH-019, respectively request information regarding the Muskrat Falls Power Purchase Agreement and the open access transmission line tariff which is expected to be implemented following interconnection to Labrador and the Maritimes. Hydro submits that it should not be required to respond to those RFIs because there will be no rate impacts from these matters within the time frame for which rates will be set in the GRA.

In Newfoundland Power’s submission, Hydro’s position with respect to these two RFIs is inconsistent with its proposal in the GRA to establish the Off-Island Purchases Deferral Account. As noted in the Consumer Advocate’s Submission, and contrary to Hydro’s submission, there are rate impacts proposed in the GRA associated with the proposed deferral account. In Newfoundland Power’s submission, it will be difficult for the Board and the parties to properly consider the merits of the proposed deferral account in the absence of more complete information regarding costs and forecast customer rates in the post-interconnection period than has been filed in the GRA to date.

Newfoundland Power has no comments regarding the remaining Consumer Advocate RFIs that are in dispute .

**Newfoundland Power Inc.**

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If you have any questions regarding the enclosed, please contact the undersigned at your convenience.

Yours very truly,



Gerard Hayes  
Senior Counsel

Enclosures

c. Tracey Pennell  
Newfoundland and Labrador Hydro

Paul Coxworthy  
Stewart McKelvey

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