

- 1 Q. (Expert Evidence – JT Browne Consulting) The Labrador-Island Link and the
2 Maritime Link open the door to imports that could provide significant benefits to
3 customers (NP-NLH-115, rev 1). However, even though the Maritime Link is
4 expected to be in service less than two months from now:
- 5 a. A power procurement plan for purchases over the Maritime Link does not appear to
6 be in place (NP-NLH-115, rev 1),
 - 7 b. A plan for sales of capacity and energy over the Maritime Link does not appear to
8 be in place (CA-NLH-179),
 - 9 c. A regulatory review process for power procurement and sales that ensures
10 customers are gaining optimal value from the new transmission links is not in place
11 (CA-NLH-176), and
 - 12 d. An open access transmission tariff has neither been filed, nor approved (CA-NLH-
13 161).

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15 Is it common for utilities to submit rate applications with so much missing
16 information? If so, please provide examples. Is submission of rate applications with
17 so much missing information consistent with established regulatory principles?
18 What guidance can you provide the Board on an approach for dealing with a rate
19 application with so much missing information?

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22 A. This response has been provided by JT Browne Consulting.

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24 Utilities can only provide the information that they have.

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26 The uncertainty related to issues, such as those raised in the above questions,
27 supports the adoption of Hydro's proposed Off-Island Purchases Deferral Account.