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August 14, 2019

Via Electronic Mail & Courier

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

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

Dear Ms. Blundon:

Re: 2018 Hydro Cost of Service and Rate Design Review Application (the "Application")
Requests for Information – IC-CA-001 to IC-CA-005 & IC-NP-001 to IC-NP-005

Please find enclosed one original and thirteen (13) copies of the Requests for Information of the Island Industrial Customers Group in relation to the above noted Application.

We trust you find the foregoing satisfactory.

Yours very truly,

POOLE ALTHOUSE


Dean A. Porter

DAP/ag
Enclosures
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cc: Shirley Walsh - Newfoundland and Labrador Hydro
Gerard Hayes - Newfoundland Power
Dennis M. Browne Q.C. - Consumer Advocate
Denis J. Fleming - Cox & Palmer
Senwung Luk – Olthuis Kleer Townshend LLP
Paul Coxworthy - Stewart McKelvey
Greg Moores – Stewart McKelvey

IN THE MATTER OF the *Electrical Power Control Act, 1994*, SNL 1994, Chapter E-5.1 and the *Public Utilities Act*, RSNL 1990, Chapter P-47 (the “Act”);

AND IN THE MATTER OF an Application by Newfoundland and Labrador Hydro (“Hydro”) for approval of revisions to its Cost of Service Methodology pursuant to Section 3 of the *Electrical Power Control Act, 1994*, SNL 1994, Chapter E-5.1 (the “Cost of Service Methodology Application”) for use in the determination of test year class revenue requirements reflecting the inclusion of the Muskrat Falls Project costs upon full commissioning.

**ISLAND INDUSTRIAL CUSTOMERS GROUP
REQUESTS FOR INFORMATION
IC-NP-001 to IC-NP-005**

Issued: August 14, 2019

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to yield similar COS results as functionalizing them as generation.
Why or why not?

IC-NP-005

With reference to lines 2 through 8 on page 35 of Mr. Brockman's Pre-Filed Evidence (August 5, 2019) please confirm whether Mr. Brockman considers it appropriate to continue the existing CBPP generation credit until a new agreement is developed or if he supports Hydro's proposal to terminate the existing agreement prior to the development of a new agreement.

DATED at St. John's, Newfoundland and Labrador, this 19 day of August, 2019.

POOLE ALTHOUSE

Per: 

Dean A. Porter

STEWART MCKELVEY

Per: 

Paul L. Coxworthy

COX & PALMER

Per: 

Denis J. Fleming

TO: The Board of Commissioners of Public Utilities
Suite E210, Prince Charles Building
120 Torbay Road
P.O. Box 21040
St. John's, NL A1A 5B2
Attention: Board Secretary

- TO: Newfoundland & Labrador Hydro
P.O. Box 12400
500 Columbus Drive
St. John's, NL A1B 4K7
Attention: Shirley Walsh
- TO: Newfoundland Power
P.O. Box 8910
55 Kenmount Road
St. John's, NL A1B 3P6
Attention: Gerard Hayes, Legal Counsel
- TO: Browne Fitzgerald Morgan & Avis
Churchill Park Law Offices
P.O. Box 23135
Terrace on the Square, Level II
St. John's, NL A1B 4J9
Attention: Dennis M. Browne Q.C., Consumer Advocate
- TO: Cox & Palmer
Scotia Centre, Suite 1000
235 Water Street
St. John's, NL A1C 1B6
Attention: Denis J. Fleming
- TO: Olthuis Kleer Townshend LLP
250 University Ave., 8th Floor
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Attention: Senwung Luk
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Attention: Paul Coxworthy
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Attention: Greg Moores