

June 6, 2019

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

**Attention: Ms. Cheryl Blundon**  
**Director of Corporate Services & Board Secretary**

Dear Ms. Blundon:

**Re: Network Additions Policy and Labrador Interconnected System Expansion Study -  
Newfoundland and Labrador Hydro's Reply to Comments of the Labrador Interconnected  
Group**

The Labrador Interconnected Group's ("LIG") letter of June 5, 2019 raises concerns regarding the Memorandum<sup>1</sup> attached to Newfoundland and Labrador Hydro's ("Hydro") Reply to the Parties' Comments filed regarding the "Labrador Interconnected System Network Additions Policy Summary Report" (the "Labrador Network Additions Policy") and the Labrador Interconnected System Transmission Expansion Study (the "Transmission Expansion Study"). In particular, the LIG asserts that Hydro was attempting to file a further expert report as fresh evidence and that Hydro was seeking to impugn Mr. Raphals' credibility and evidence.

Hydro in no way intended to impugn Mr. Raphals' credibility, nor did Hydro have any ill intent in filing the Memorandum from Christensen Associates Energy Consulting, LLC ("Christensen"). The Memorandum from Christensen contained responses to six aspects of Mr. Raphals' responses to the Requests for Information ("RFI") issued by either Hydro or the Board of Commissioners of Public Utilities (the "Board"). Christensen's responses were limited to corrections of Mr. Raphals' interpretation of the Christensen Report.<sup>2</sup> Specifically:

- Issue 1 addressed information regarding the United States' Federal Energy Regulatory Commission already provided and on the record;
- Issue 2 is merely a clarification of why the Christensen Report did not mention the Labrador Network Additions Policy and reiterates information already on the record;
- Issue 3 discusses a comment of Mr. Raphals in the RFI responses where he interprets the Christensen Report incorrectly and reiterates information already discussed and on the record in the report;
- Issue 4 contests Mr. Raphals' assertion but does not provide additional information;

<sup>1</sup> Bruce Chapman and Robert Camfield, "Review of Responses by Philip Raphals to Questions re Network Additions Policy," Memorandum, May 31, 2019.

<sup>2</sup> "Transmission Cost Allocation Methods to Account for Network Additions," Christensen Associates Energy Consulting, LLC, July 18, 2018, filed as Appendix A to Hydro's "Network Additions Policy Review," October 1, 2018.

- Issue 5 contests Mr. Raphals' assertion but does not provide additional information; instead it refers back to the Christensen Report already on the record; and
- Issue 6 contests Mr. Raphals' assertion but does not provide additional information.

As Mr. Raphals did not raise the issues regarding the interpretation of the Christensen Report in either of his reports,<sup>3</sup> Hydro did not have the opportunity to question those conclusions during the RFI process. Additionally, due to an innocent issue with the transmission of the RFI responses from the LIG to Hydro, Hydro did not receive the responses to the RFIs until the day before the LIG's comments were filed. Hydro filed the Memorandum with its reply in the interests of expediency and clarity for the Board.

As Hydro believed—and continues to believe—that the information contained in the Memorandum is not fresh evidence, Hydro does not believe a supplemental report is appropriate. However, Hydro does not object to the LIG's request to file a reply submission to the points detailed in the Christensen Memorandum.

Should you have any questions, please contact the undersigned.

Yours truly,

**NEWFOUNDLAND AND LABRADOR HYDRO**



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Shirley A. Walsh  
Senior Legal Counsel, Regulatory  
SAW/sk

Encl.

cc: Gerard M. Hayes, Newfoundland Power  
Paul L. Coxworthy, Stewart McKelvey  
Dean A. Porter, Poole Althouse  
ecc: Gregory Moores, Stewart McKelvey

Dennis Browne, Q.C., Browne Fitzgerald Morgan & Avis  
Denis J. Fleming, Cox & Palmer

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<sup>3</sup> Philip Raphals, "Newfoundland and Labrador Hydro's Proposed Network Addition Policy and Transmission Expansion Study," Helios Centre, April 25, 2019 and Philip Raphals, "Newfoundland and Labrador Hydro's Proposed Network Addition Policy and Transmission Expansion Study—Addendum," Helios Centre, May 6, 2019.