

1 Q. Hydro proposes on page 4, paragraph 19(i) of the Application that the Board approve:

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3 Hydro's filing of its next GRA no later than nine months from the date upon
4 which both the revised financial structure for the Muskrat Falls PPA and
5 Government's rate mitigation plan have been finalized and publicly
6 communicated.
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8 Given that the timing of both of these events is out of Hydro's control and is subject to a great
9 deal of uncertainty in the circumstances, should a date be established for the GRA to be filed
10 should both of these events not occur by a certain time?
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14 A. In Newfoundland and Labrador Hydro's ("Hydro") view, setting a General Rate Application
15 ("GRA") filing date without certainty on the availability of the details surrounding the revised
16 financial structure for the Muskrat Falls Purchase Power Agreement ("PPA") and the
17 Government of Newfoundland and Labrador's ("Government") rate mitigation plan could result
18 in substantial regulatory inefficiencies.

19 Government has publicly advised that a revised Muskrat Falls PPA is pending as are other details
20 on rate mitigation options. Were Hydro required to file its GRA in advance of the release of this
21 information, it is likely that Hydro would need to revise and refile its GRA at a later date
22 reflecting the updated Muskrat Falls Project costs and the ongoing GRA process would
23 effectively be required to be restarted. Depending upon how far the GRA process had advanced,
24 the re-filing could additionally result in a repetition of work and effort on the part of the Board
25 and the parties. Such a circumstance would result in substantial regulatory inefficiencies,
26 increase the costs to the parties and customers, and increase redundancies in the effort
27 expended for evidence development by Hydro staff.

28 As a result, Hydro believes that the filing requirement of its next GRA should be established with
29 direct linkage to the timing of finalization and public release of the Muskrat Falls PPA and
Government's rate mitigation plan.