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April 29, 2022

The Board of Commissioners of Public Utilities  
Ms. G. Cheryl Blundon, Board Secretary  
Prince Charles Building  
210 - 120 Torbay Road,  
St. John's, NL, A1A 2G8

Dear Ms Blundon:

**Re: Application for Exemption from Regulation 17 – Wabush Airport**

We write in respect of the above-noted application. Please find enclosed the submissions of the Labrador Interconnected Group.

Please contact the undersigned with any questions you may have regarding the enclosed.

Respectfully,  
*OLTHUIS KLEER TOWNSHEND LLP*

A handwritten signature in black ink, appearing to read 'Senwung Luk', written in a cursive style.

Senwung Luk

Encl.

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

**AND IN THE MATTER OF** the Application for Exemption to Regulation 17 — Wabush Airport, filed by Hydro.

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**Submissions  
of the Labrador Interconnected Group**

**Application for Exemption to Regulation 17 — Wabush Airport**

**April 29, 2022**

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## **Introduction**

1. The Labrador Interconnected Group (the “LIG”) represents the communities of Sheshatshiu, Happy Valley-Goose Bay, Wabush, and Labrador City. These communities are all part of the Labrador Interconnected System (“LIS”).
2. On April 4, 2022, Newfoundland and Labrador Hydro (“Hydro” or “NLH”) applied for approval of an exemption to Regulation 17 with respect to a service request from Transport Canada in relation to the Wabush Airport (the “Application”).
3. The LIS is in support of this Application but wishes to add two points for the Board’s consideration.

## **The Application should be approved**

4. The Application is to improve service to the Wabush Airport, which is an important piece of infrastructure for the community.
5. We also note that Hydro has confirmed that the Application will not accelerate the need for new transmission investment in Labrador.<sup>1</sup>
6. For these reasons, the LIS would support the approval of this Application.

## **Impact on generation capacity must be considered**

7. The approval of the Network Additions Policy has been an important milestone for Labrador in terms of assuring the long term health and cost fairness of the transmission system. However, there remains work to be done to ensure that a similar process is in place to protect the long term integrity of the generation system.

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<sup>1</sup> LAB-NLH-002 (d).

8. As Hydro stated, after the approval of the Network Additions Policy, it asked customers to submit requests to allow it to proceed with a High Level System Impact Analysis. The result was that it received requests for 8000 MW of firm load,<sup>2</sup> which exceeds the current load on the LIS by more than a magnitude of 20. To supply even 1000 MW of incremental load (one eighth of the requests that Hydro received) would require almost \$6 billion in generation upgrades.
9. While detailed consideration of the impacts of such a magnitude of requests is beyond the scope of the present proceeding, the LIS urges the Board to give detailed consideration of the impacts of such requests in another proceeding, such as the Resource Reliability and Adequacy proceeding.

### **Consideration of heat pump technologies**

10. The LIS notes that heat pump technologies were not considered by Transport Canada or Hydro before preparing the Application, because it was not likely to be the least cost solution.<sup>3</sup> We would urge Hydro to note that the Government of Canada has a 2030 Emissions Plan which has committed the federal government to decarbonize Canada's economy by supporting heat pump projects.<sup>4</sup>
11. As such, the federal government may be able to support such a project even if it were not the lowest cost solution. A heat pump solution would likely lower demand on the system, which would also be beneficial for LIS customers because of reduced infrastructure costs for both generation and transmission sides of the electrical system.

**ALL OF WHICH IS RESPECTFULLY SUBMITTED.**

DATED at Toronto, Ontario, this 29<sup>th</sup> day of April, 2022.

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<sup>2</sup> LAB-NLH-001, att 2, p1 of 4.

<sup>3</sup> LAB-NLH-005.

<sup>4</sup> <https://www.canada.ca/content/dam/eccc/documents/pdf/climate-change/erp/Canada-2030-Emissions-Reduction-Plan-eng.pdf>, p78-79.

*OLTHUIS KLEER TOWNSHEND LLP*



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