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

Dear Commissioners:

Re: Newfoundland and Labrador Hydro- 2013 General Rate Application - Schedule for Responses to Requests for Information ("RFI")

We are legal counsel for Innu Nation.

Innu Nation requests that the Board postpone the due date for the Round 2 RFI questions to a date at least two weeks after all of the Round 1 RFI responses have been provided by Newfoundland and Labrador Hydro ("NLH") to the Parties.

We drafted our Round 1 RFIs as a set. We cannot reasonably draft Round 2 questions until we have received and reviewed all of the responses to our Round 1 questions. Many of the questions are inter-related and we have only received some of the responses to each area of our questions. Given that our questions are inter-related, it is inefficient for us to review in detail the responses until we receive all of the responses.

If we were required to formulate RFIs for Round 2 before we are able to review the complete set of Round 1 responses, it will also result in Innu Nation and NLH expending unnecessary time and effort. For example, if NLH's suggestion is followed, we may spend time drafting Round 2 RFIs that are later answered by NLH in responses to Round 1 questions still to be provided, which will result in wasted efforts.

Yours truly,

Nancy Kleer

SK/cb

c.c. Newfoundland & Labrador Hydro
Mr. Geoffrey Young

Mr. Colin Feltham

Newfoundland Power Inc.

Mr. Linn O'Brien

Mr. Gerard Hayes

Consumer Advocates

Ms. Colleen Lacey

Mr. Thomas Jolmson

Corner Brook Pulp and Paper Limited; North Atlantic Refining Limited and Teek Resources

Mr. Dean Porter

Vale Newfoundland and Labrador Limited

Mr. Denis Fleming

Mr. Thomas O'Reilly

Island Industrial Customers Group

Mr. Paul Coxwmihy

MP Labrador

Ms. Yvmme Jones

Towns of Labrador City, Wabush, Happyvalley-Goosebay and North West River

Mr. Edward Hearn