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August 29, 2024

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**Via Courier and Email**

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

**Attention: Ms. Jo-Anne Galarneau, Board Secretary**

Dear Ms. Blundon:

**Re: Newfoundland and Labrador Hydro- Reliability and Resource Adequacy Study  
Review to Parties- 2024 Resource Adequacy Plan- Issues List**

This is in response to the Board's correspondence of August 22, 2024, requesting any comments on the Board's proposed Issues List by today.

As is noted under Issue 2 of the Board's proposed List, at least some elements of Hydro's Expansion Plan Analysis appear to posit tradeoffs between reliability and cost. As raised under Issue 4 of the Board's proposed List, there are questions as to whether Hydro is giving due consideration to ECDM solutions and to its hydroelectric generation options. All of these questions have rate impact implications.

The Island Industrial Customer (IIC) Group submit that Resource Adequacy planning, at every stage, should be integrated with due consideration of costs and rate impacts, including rate impact by customer class. This is necessary so that all options can be thoroughly assessed with the informed participation of all stakeholders, given relatively short timelines for approval of some of the projects proposed by the RAP. The IIC Group submit that rate impact modelling should focus not just on distribution but also on impacts on bulk power (Generation and Transmission).

We trust this is in order.

Yours truly,

Stewart McKelvey

Paul L. Coxworthy

PLC/tas  
Enclosures

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