Office of the Consumer Advocate

PO Box 23135
Terrace on the Square
St. John's, NL Canada
A1B 4J9

Tel: 709-724-3800
Fax: 709-754-3800

December 2, 2025

Via Email

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

Attention: Jo Galarneau
Executive Director and Board Secretary

Dear Ms. Galarneau:

Re: NL Hydro - 2026 Capital Budget Application
– Submission of the Consumer Advocate

On July 15, 2025 Newfoundland and Labrador Hydro ("Hydro") submitted to the Public Utilities Board (the "Board") its 2026 Capital Budget Application, hereafter referred to as the "Application" or "2026 CBA".

Hydro (Application, para. 2) "*proposes $131.6 million in 2026 expenditures, comprised of expenditures related to single-year programs and projects proposed for completion in 2026, 2026 expenditures for multi-year programs and projects commencing in 2026, as well as those expenditures in 2026 related to multi-year programs and projects approved in previous capital budget applications. This amount includes $1.5 million in expenditures for which approval to specifically assign the costs to certain customers is requested herein. No new leases with costs in excess of $750,000 over the expected life of the lease are proposed for 2026.*"

Hydro notes (Application, para. 3) that the Application does not include "*the 2026 expenditures related to supplemental applications approved by or currently before the Board, or those anticipated to be filed with the Board in 2026 as supplemental applications once a full analysis of the proposed project is complete. The request for approval also does not include the 2026 expenditures for Major Project applications approved or currently before the Board, or those anticipated to be filed with the Board in 2026.*

Hydro also requests the Board to approve (Application, para. 18d) "*Fixing and determining Hydro's average rate base for 2024 in the amount of $2,379,043,000.*"

The Board has directed the parties to make final written submissions on the Application by December 2, 2025. This submission documents the Consumer Advocate's position on Hydro's 2026 CBA.

CONTEXT

The extraordinarily high capital spending plans by the province's electric utilities are alarming. In particular, Hydro's proposed post-2026 capital expenditures are massive. They are driven by Hydro's plans to add substantial and costly additions to IIS capacity while prolonging reliance on the Holyrood TGS as a generation facility, which in part are due to less than expected reliability of the extraordinarily expensive Muskrat Falls project. It is stated (Application, 2026 Capital Budget Overview, page 9) "*Hydro's average capital expenditure from 2015 through 2024 was approximately $154.1 million annually, which was driven primarily by expenditures on asset renewal; from 2025 to 2030 the anticipated average expenditure increases to approximately $525.5 million annually.*"[1] This is an average increase of 241%. Hydro is forecasting that domestic rates on the Island Integrated System (IIS) will increase from about 15 cents/kWh today[2] to about 25 cents/kWh by 2035 (Hydro Build Application, Schedule 3, Attachment 1, Table 5).

In fact, the true cost of electricity supply will be much greater as these figures incorporate rate mitigation. As stated in CA-NLH-113, the 25 cents/kWh figure does not reflect the true cost of supply, but rather is reduced by assumptions relating to government rate mitigation.[3] If consumers were completely informed that the full future cost of electricity was more than 25 cent a kWh, what would happen to system growth?

The burden of the rate mitigation plan on the NL government is astounding. As stated in CA-NLH-123 "*At the time of its finalization in May 2024, rate mitigation from 2023 to 2030 was estimated to cost over $2 billion of Hydro funds and an additional $1 billion in federal investment. Since payment of the Muskrat Falls Project costs began in 2021, an estimated $1.2 billion of funding has been applied against the balance of the SCVDA to date. This includes approximately $0.5 billion of payment made in the form of the federal convertible debenture, and the remaining $0.7 billion made in payments by Hydro and the Government of Newfoundland and Labrador ("Government").*" The $3 billion paid to fund rate mitigation from 2023 to 2030 compares to a provincial budget for FY 2025/26 of $11 billion.[4] Rate mitigation is a significant contributor to the projected provincial deficit in FY2025/26 of $372 million.[5]

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[1] These figures exclude any allowance for capital costs associated with an application from Hydro for the long-term supply for Southern Labrador (2026 Capital Budget Overview, page 10). The most recent application in that regard sought more than $100 million in capital expenditure but it was rejected by the Board, as was a request for reconsideration: see P.U. 12 (2025) and P.U. 31 (2025).

[2] This includes the recent 7% rate increase effective July 1, 2025 which does not recover all of the revenue requirement approved by the Board in its decision of Newfoundland Power's 2025-2026 GRA.

[3] CA-NLH-123, Footnote 3 states "*Assumptions included continuation of rate mitigation beyond 2030 but with a phased-in collection of costs related to the expansion builds.*"

[4] https://www.gov.nl.ca/budget/2025/what-you-need-to-know/budget-highlights/

[5] https://www.gov.nl.ca/budget/2025/what-you-need-to-know/budget-highlights/

Adding billions of dollars in capital costs for new capacity on the IIS over the coming years will surely make rate mitigation even more costly. The sustainability of rate mitigation and Hydro's current course is questionable. Moreover, to the extent more costs are passed along in electricity rates, customers would be incentivized to reduce consumption of electricity and substituting to other energy sources. That would only serve to make matters worse as the sunk cost of new capacity would still have to be paid. In short, Hydro's plans risk leading customers/taxpayers to a cost crisis. Avoiding it requires innovation and much more action on the demand side of the market, including improved rate design, to preempt costly capacity additions.

It is crucial that the Board consider this context as it considers sizeable capital applications by Hydro.

AREAS OF CONCERN

Turning specifically to the current Application, the proposed 2026 expenditure for which approval is being sought is more consistent with prior requests rather than the massive amount anticipated after 2026.

Having reviewed the Application along with Hydro's responses to two rounds of requests for information from the parties, 133 of which were submitted by the Consumer Advocate's Office, the Consumer Advocate has comments on only one of the 2026 CBA's projects and programs for which Hydro is seeking Board approval. However, our review process also identifies six points of broader concern that we ask the Board to give careful consideration. They relate to the capital budget application and overall planning process used to meet the needs of electricity consumers in the province.

1) ***The Need to Finalize the Capital Budget Application Guidelines***: As documented in our submissions on capital budgets in recent years, neither Hydro nor Newfoundland Power have the capability to meet the requirements set out in the Board's Provisional Capital Budget Application Guidelines. CA-NLH-015 identifies the areas where Hydro does not meet the Guidelines. Hydro is currently assessing means for improving its asset management practices, but falls well short of meeting requirements relating to the quantification of risk and reliability improvements deemed to be provided by the projects and programs in its capital budgets. In the absence of such information, it is not possible for the Board and intervenors to conduct a proper and informed audit of the capital budget.

   The Consumer Advocate would welcome further discussion in an effort to finalize the Capital Budget Application Guidelines to better inform these asset management reviews before they move further along in development. However, the last communication on the Capital Budget Application Guidelines review was issued three years ago in December 2021. The Board has not issued any communication regarding the schedule for the review. We urge the Board to move forward with its review as the current Provisional Capital Budget Application Guidelines: 1) are not being enforced, so do not ensure maximization of benefits to consumers, and 2) are not consistent with changes going on in the industry and best practices emerging in other Canadian provinces.

2) ***The Need for Hydro to Improve Project Execution***: It is paramount that Hydro continues to improve project execution. Capital spending carryovers are concerning when there is significant uncertainty relating to the province's electricity supply. Documents associated with Hydro's Reliability and Resource Adequacy Study identify such uncertainties, including: the reliability of Muskrat Falls generation and the LIL, the reliability of Holyrood TGS as a backup source of supply, electricity demand which could increase substantially in light of government net-zero emissions efforts, and forecast generation capacity shortfalls. In light of these uncertainties, it is of vital importance that existing assets be maintained to ensure reliable performance going forward.

   We urge the Board to encourage Hydro to address project execution issues to ensure that customers are not confronted with widespread power outages.

3) ***The Need for Improved Estimates:*** We are very much concerned about Hydro's estimating process. Hydro has had a huge cost overrun on the project for Section Replacement and Weld Refurbishment for Bay d'Espoir. Hydro indicates in its presentation on the 2024 Resource Adequacy Plan Technical Conference #4 (October 29, 2024, slide 49) that it is taking "*significant steps to mature its cost estimating and project budget development skills*". We support such steps, and believe that the same level of attention should be paid to the cost estimation process for existing assets such as the Bay d'Espoir Unit 7 life extension.

4) ***Metering***: According to CA-NLH-116, Hydro proposes to spend roughly $18 million in the 6-year period from 2022 to 2027 on metering. It is spending this money on Automatic Meter Reading (AMR) technology as opposed to state-of-the-art Automatic Metering Infrastructure (AMI, or smart meters). That funding should be for smart meters rather than outdated AMR. Hydro's own expert, Util-Assist Inc., recommended adoption of smart meters (AMI).

   In CA-NLH-012 (pertaining to Hydro's 2025 CBA) Hydro states (part i) "*Through the development of its 2022 Capital Budget Application "Replace Metering System" ("Metering Application"), Hydro commissioned a study on various metering technology alternatives which was prepared by a third party, Util-Assist. The results of this study are consistent with Hydro's Metering Application, that drive-by AMR was the least cost alternative to address its metering requirements, particularly in the context of the Conservation Potential Study's findings on dynamic rates. A copy of this study is provided as CA-NLH-012, Attachment 1.*" Attachment 1 is a June 15, 2020 report by Util-Assist Inc. entitled "Business Case Report for Next Generation Metering (NGM) - Newfoundland and Labrador Hydro".

   Util-Assist studied four options: full-scale AMR (Option 1), full-scale AMI (Option 2), AMR-lite (Option 3), and AMI-lite (Option 4). It recommended one of the AMI (smart meter) options, namely, Option 4. Util-Assist states (page 8 of 64) "*the technological limitations to a drive-by solution are too great. As noted in Section 2: Technology and Trends, the trend amongst utilities in Canada and really across North America is toward the deployment of AMI. Drive-by AMR*

meter reading is something that electric utilities are moving away from and not towards. As the utility industry is searching for ways in which to improve Customer Experience, drive-by metering does the opposite in that it improves the utility's experience while preventing any meaningful impact to the customer." Util-Assist goes on to say *"Drive-by metering is enticing due to relative cost in comparison to AMI, but when viewed in the current climate of where the industry is with more advanced AMI solutions and the fact that this will be a 20-year investment, the risk to move forward with Drive-by metering is too great and is not recommended."*

Yet Hydro refuses to undertake a cost-benefit analysis of AMI (smart meters) relative to AMR. In CA-NLH-068, Hydro admits that it has gone about 53% over-budget on a project to install AMR meters that its consultant, Util-Assist advises against.

In CA-NLH-127 Hydro was asked "*Please identify each benefit attributable to AMI and show the savings owing to each benefit that has been included in the cost benefit analysis.*" Clearly, Hydro has not undertaken a complete review of AMI (smart meters) as its response not only fails to provide a complete list of benefits, but also fails to quantify even one of the benefits.

And in CA-NLH-101, Hydro was asked to clarify the following statement: "*Hydro's 2019 Conservation and Demand Management Potential Study found that Automated Metering Infrastructure ("AMI") would serve to increase system peak on the Labrador Interconnected System and therefore drive-by AMR system costs continue to meet Hydro's obligation for least cost, environmentally responsible, and reliable service to customers.*" Hydro completely misses the point of the question. AMI (smart meter) does not increase system peak and drive up the cost of supply. However, poor rate design can. The Consumer Advocate is promoting intelligent rate design, and intelligent rate design can only be effectively and efficiently implemented with AMI (smart meter) technology.

Why is Hydro opposed to undertaking a proper cost-benefit analysis of smart meters? New Brunswick Power filed evidence with the New Brunswick Energy and Utilities Board more than 6 years ago, on August 1, 2019 entitled "Advanced Metering Infrastructure Capital Project (https://www.nbpower.com/media/1489724/nbp0103.pdf). The New Brunswick Power study quantified the following benefits of smart meters relative to AMR: i) Reduced Manual Meter Reading and Meter Service Orders; ii) Avoided Meter Replacement Costs; iii) Conservation Voltage Reduction; iv) High Bill Alert Service; v) Distribution Network Losses; vi) Meter Accuracy Losses; vii) Avoided Cost of Load Research Program; viii) Avoided Cost of Net Metering Program; ix) Avoided Cost of Meter Services Manager Salary; x) Avoided Cost of Meter Reading Vehicles; xi) Outage Restoration (Crew management); xii) Reduced Customer Inquiries; xiii) Avoided Cost Of Handheld System; xiv) Unbilled/Uncollectable Accounts; xv) Avoided Cost of Meter Reading Supervisor; and xvi) Reduced Overtime for Meter Service Orders. It also identified 12 additional customer and societal benefits of AMI that were not quantified such as "*time-varying rates, which can provide significant benefits to customers and NB Power by providing more efficient price signals, and geographically-targeted demand-side management (DSM) programs, which can avoid or defer costly transmission & distribution ("T&D") investments based on AMI-derived visibility into grid needs and patterns.*"

In Dunsky's 2019 study of smart meters in NL, it assessed only (CA-NP-070b pertaining to Newfoundland Power's 2025 CBA) "*load shifting potential of dynamic rate structures, including an estimate of the cost of AMI implementation. The consultant did not complete an overall assessment of smart meters.*" Therefore, neither Dunsky nor Util-Assist quantified all benefits of smart meters. Had these studies assessed all benefits, smart meters would likely have proven to be least cost. The New Brunswick Power study was undertaken more than 6 years ago, and justified smart meters even without quantifying the benefits from load shifting, the lone benefit quantified by Dunsky in its study of smart meters for NL.

The Board should approve Hydro's funding request for meters on condition that the funds be used for AMI (smart meters) as recommended by Util-Assist.

5) ***Falling behind other provinces.*** NL's power sector is falling behind other jurisdictions, particularly as it relates to smart grid applications that enable optimum use of existing assets and expansion of renewable energy sources to take advantage of customer-owned generation opportunities. New Brunswick Power filed evidence with the New Brunswick Energy and Utilities Board on August 1, 2019 entitled Advanced Metering Infrastructure Capital Project which states (page 5) "*The pace of technological change has been increasing and will continue to increase.* ***NB Power believes that continuing to plan on the basis of making investments in traditional utility assets in the face of such change may not be prudent and reasonable.***" (emphasis added)

Nova Scotia Power states on its website "*Globally, the electrical grids that have served us over the past century are evolving through new technology into "smart grids". Smart grids offer a future in which individual pieces of the electrical system - including "smart devices" in customers' homes and businesses - can communicate with one another, so that the entire electrical system works together to use energy more efficiently. This means lower overall costs for customers and a cleaner environment.*"

Hydro and Newfoundland Power cannot evolve the electricity system into a "smart grid" without smart meters. New Brunswick Power recognized this 6 years ago. Owing to an outdated planning approach, NL continues to fall behind other jurisdictions.

Under the current structure of the power sector in NL, Hydro and Newfoundland Power each perform the roles of both distribution operator and supplier in their respective franchise areas. The distribution operator function includes management of the physical delivery of electricity via the distribution wires and substations. The distribution supplier function includes management of the commercial aspects of power delivery and may include rate options such as time-of-use rates and demand control, energy efficiency, customer-owned generation, and other behind-the-meter alternatives such as fuel cells and batteries. These supplier activities require installation of smart meters. In electricity markets with retail competition, the two functions are separate with the operator function regulated and the supplier function deregulated.

Both Hydro and Newfoundland Power fall well short of meeting the distribution supplier function. They are far more interested in the distribution operator function as witnessed by the fact that neither utility has a Strategic Distribution Plan.

In a monopoly jurisdiction such as NL where both the distribution operator and supplier functions are combined, the regulator must ensure that customer interests are served, and Hydro and Newfoundland Power must cooperate fully in the planning process. Under the current arrangement, customer interests are not being served as witnessed by the following:

i) The utilities have done very little to promote customer-owned generation. According to CA-NP-100b (pertaining to NP's 2026 CBA) "*As of the end of 2024 there were 55 net metering projects in service in Newfoundland Power's service territory, with a total capacity of 602 kW.*" This is a paltry effort by the province's utilities. In comparison, Nova Scotia's total net-metered solar installations exceeded 11,000 in 2024, surpassing the 2023 total by 27%. The total net-metered solar capacity in Nova Scotia now exceeds 100 MW. Including non-net-metered Community Solar, behind-the-meter solar, and Solar Electricity for Community Buildings Projects, the province's total solar capacity is approximately 120 MW (120,000 kW).[6] New Brunswick has 1,350 net metering customers producing more than 17 MW of green capacity and avoiding 17,000+ metric tons of greenhouse emissions.[7] While electricity prices are currently higher in Moncton, NB and Halifax, NS at 16.8 cents/kWh and 19.19 cents/kWh, respectively (compares to 15.79 cents/kWh in St. John's, NL)[8], electricity prices on the Island are forecast to increase to 25 cents/kWh by the mid-2030s, thus providing a significant incentive to customers to install their own generation.

ii) The province is woefully behind other Canadian provinces in retail rate design in spite of Newfoundland Power's agreement to conduct a Retail Rate Design Review in a Settlement Agreement relating to its 2023-2024 General Rate Application signed on November 22, 2021. Four years later, NP has yet to offer a single new rate design. Improvements to rate design based on marginal costs are needed more than ever in light of the massive capital expenditures on capacity contemplated in the Reliability and Resource Adequacy Study. A more efficient pricing regime would help delay or reduce those costly additions to the IIS's capacity. A new more efficient rate design could be implemented in very little time and could be further enhanced after AMI is in place; admittedly, this entails Newfoundland Power finally completing its retail rate design study but because this is such an important matter the Board should ascertain from Newfoundland Power what can be done as soon as possible.

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[6] https://www.linkedin.com/posts/davidbrushett_nova-scotia-power-released-its-2024-net-metering-activity-7311069451045486592-Pus-/

[7] https://www.nbpower.com/en/products-services/net-metering/

[8] https://www.fraserinstitute.org/sites/default/files/2025-03/energy-costs-and-canadian-households-how-much-are-we-spending-2025.pdf

iii) It is not clear that Hydro and Newfoundland Power are working together to develop a power system expansion plan that best meets the needs of customers. A coordinated plan is necessary given that Hydro has identified a need for capacity and energy additions to the power system in the early 2030s.

iv) It is not clear when, if ever, customers will reap benefits of Hydro's asset management review. Hydro is currently unable to quantify the risk of not proceeding with a capital project or program; neither can Hydro quantify the reliability improvement resulting from a capital project or program.

In short, the utilities are doing little to improve the customer experience and reduce the impact of their capital programs on rates, and are unlikely to do so until the Board directs them to. Hydro and Newfoundland Power must make substantial efforts to incorporate behind-the-meter alternatives and smart grid applications. Hydro and Newfoundland Power must evolve their grids into "smart grids" through the deployment of smart meters and expansion of behind-the-meter opportunities such as customer-owned generation, battery energy storage systems such as those in electric vehicles, conservation, demand control and time-varying rates. The outdated planning approach currently being undertaken by the province's electric utilities does not give proper weighting to smart grid and behind-the-meter opportunities, and as a result, the province is falling behind other jurisdictions. Smart grid and behind-the-meter applications reduce demand and the need for spending on traditional utility assets. That is the future of electricity. Considering the enormous amount of capital spending being proposed over the next five years, this is not the time for status-quo and old-technology thinking.

6) ***Customer willingness to pay for reliability improvements***. It is stated (Application, 2026 Capital Budget Overview, page 1) "*Hydro conducted a digital engagement process where it asked customers to share their thoughts on the costs and reliability of the province's electrical grid. As part of that process, four out of five customers told Hydro they believed the system was reliable, and 87% said they did not want to pay more for reliability improvements that led to fewer or shorter outages. Customers largely prioritize the lowest impact on electricity rates rather than other factors, and Hydro is mindful of this concern as it continues asset management planning.*" However, in CA-NLH-124 Hydro states "*the engagement also revealed that customers range of tolerance for outages is between 1.3 and 2.5 outages annually.*" And in CA-NLH-111, Hydro states "*Non-negotiable is defined as "not open to discussion or reconsideration." Generally, residents surveyed favoured an approach that involves good reliability with a lower impact on cost and were not open to compromising on reliability.*" Despite this statement, Hydro has not provided any evidence that customers are aware of the significant cost of "ensuring" customers will not have more than 2.5 outages annually. Customers cannot "negotiate" the issue of reliability without proper costs inputs. To say the least, Hydro's interpretation of the digital engagement process is convoluted. Does Hydro believe that the results of the digital engagement process support a rate increase from about 15 cents/kWh today to 25 cents/kWh by the mid-2030s?

WIDEN RIGHT OF WAY- GROS MORNE NATIONAL PARK

Hydro proposes to widen the right-of-ways (ROWs) of transmission lines that run through Gros Morne National Park from 9 metres currently to 11-16 metres consistent with practice elsewhere on its system. The estimated project cost is $2,663,700 spread over the next five years ($1.22 million in 2026). The narrower ROWs were part of a plan to reduce the impact on Gros Morne National Park which is a UNESCO World Heritage Site. Hydro claims that the transmission lines on these ROWs, TL226, TL227 and TL229, are the worst-performing transmission lines on its system with respect to tree contacts (CA-NLH-096b) and that they pose an electrical safety hazard to anyone travelling the ROWs, as well as a significant forest fire risk (CA-NLH-096g).

The claim that the three transmission lines are the worst-performing ones with respect to tree contacts is a very narrow criterion; many factors affect transmission line performance. The appropriate metric should be how their performance ranks relative to other transmission lines. With respect to outages due to tree contacts, there has been none on TL226 since November 2019 and none on TL227 or TL229 since April 2021 (CA-NLH-096a).

As for injuries and forest fires, such risk always exist. The issue at hand is whether they are high or increasing. In that regard, there have been no injuries or forest fires resulting from the narrower ROWs in the 55-year history of the lines (CA-NLH-131). Hydro states (CA-NLH-131) "*the risk of wildfires resulting from contact is also increasing*" and attributes that increase in risk to global climate change. While climate change may well increase the likelihood of forest fires, in general that important matter is for Parks Canada and the provincial government department of Forest, Agriculture and Lands to address. The key question here is whether climate change will cause more trees to fall on or make contact with the transmission lines in Gros Morne Park. No evidence has been provided of any increased risk of tree contacts relative to the past 55 years.

It is also noteworthy that the narrow right of way was originally requested by Parks Canada (CA-NLH-097b) and the current proposal to widen it was not due a request from Parks Canada (CA-NLH-097d). It is Parks Canada that is ultimately responsible for the National Park.

In sum, considering the history of the past 55 years and the lack of evidence that the risk of tree contacts has increased, it seems that maintaining the existing right of way would not increase the risk of injury or forest fires or reduced reliability. Hydro has not adequately justified this project and therefore the Board should not approve it.

SUMMARY

Looking beyond this Application, there are reasons to be very alarmed by the magnitudes of the capital expenditures that Hydro is proposing for the future.

With respect to the current Application, there are broad issues arising from our review that are concerning. In that regard, the Board ought to:

1) finalize the Provisional Capital Budget Application Guidelines including a plan directing the utilities to meet the requirements in a timely manner;

2) direct Hydro to file a plan to make further progress in reducing the backlog of project carryovers stemming from its capital budget applications;

3) direct Hydro to undertake to improve its project cost estimation process, particularly for assets that are critical to the reliable supply to the Island system during the bridging period to 2035, such as Bay d'Espoir and Holyrood;

4) require Hydro to use the requested funding for meters for the purchase on AMI technology unless Hydro can provide evidence to show that Util-Assist's recommendation of an AMI-Lite strategy is inappropriate despite the benefits identified by Util-Assist as well as the additional benefits listed in this submission;

5) direct Hydro to employ integrated planning processes that de-emphasize traditional wires projects and programs in favour of smart grid and behind-the-meter applications consistent with the least cost provision of power in an environmentally responsible manner; and

6) direct Hydro to undertake a meaningful customer engagement process that better defines the value customers place on the reliability of supply.

As for the specific programs and projects in the Application, the Consumer Advocate recommends that the Board reject the proposed project to widen the ROWs of the transmission lines that traverse Gros Morne National Park at a cost of $2,663,700. It is not adequately supported by evidence.

Please contact the undersigned if you have any questions on this submission.

Yours truly,

Dennis Browne, KC
Consumer Advocate

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cc **Newfoundland & Labrador Hydro**
Shirley Walsh (ShirleyWalsh@nlh.nl.ca)
NLH Regulatory (nlhregulatory@nlh.nl.ca
Denis Fleming (dfleming@coxandpalmer.com)

Newfoundland Power Inc.
Dominic J. Foley (dfoley@newfoundlandpower.com)
Douglas Wright (dwright@newfoundlandpower.com)
NP Regulatory (regulatory@newfoundlandpower.com)

Labrador Interconnected Group
Senwung Luk (sluk@oktlaw.com)
Nick Kennedy (nkennedy@oktlaw.com)

Teck Resources Limited
Shawn Kinsella (shawn.kinsella@teck.com)

Island Industrial Customers Group
Paul Coxworthy (pcoxworthy@stewartmckelvey.com)
Glen G. Seaborn (gseaborn@poolealthouse.ca)

Board of Commissioners of Public Utilities
Jacqui Glynn (jglynn@pub.nl.ca)
Ryan Oake (roake@pub.nl.ca)
Colleen Jones (cjones@pub.nl.ca)
Board General (board@pub.nl.ca)

Iron Ore Company of Canada
Greg Moores (gmoores@stewartmckelvey.com)