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October 11, 2018

Board of Commissioner of Public Utilities

120 Torbay Road Prince Charles Building, Suite E-210 St. John's, NL A1A 5B2

Via Email and Courier cblundon@pub.nl.ca

ATTENTION: CHERYL BLUNDON, DIRECTOR OF CORPORATE SERVICES

Dear Ms. Blundon:

RE: NEWFOUNDLAND POWER INC. – 2019 – 2020 GENERAL RATE APPLICATION WITNESS AND ISSUES LIST

Enclosed are the original plus 9 copies of International Brotherhood of Electrical Workers, Local 1620 Witness List and Issues List.

If you have any questions, please do not hesitate to contact the undersigned.

Sincerely, MARTIN WHALEN HENNEBURY STAMP

MARK MURRAY

MARK MURRAY MM/md Encls.

cc. Newfoundland Power Inc.

Kelly Hopkins, Email: <u>khopkins@newfoundlandpower.com</u> Liam O'Brien, E-mail: <u>lobrien@curtisdawe.com</u> NP Regulatory, E-mail: <u>regulatory@newfoundlandpower.com</u> <u>Consumer Advocate</u> Dennis Browne, Q.C., E-mail: <u>dbrowne@bfma-law.com</u> Stephen Fitzgerald, E-mail: <u>sfitzgerald@bfma-law.com</u> Sarah Fitzgerald, E-mail: <u>sarahfitzgerald@bfma-law.com</u> Bernice Bailey, E-mail: <u>bbailey@bfma-law.com</u>

IN THE MATTER OF

the *Electrical Power Control Act, 1994*, SNL 1994, Chapter E-5.1 (the "*EPCA*") and the *Public Utilities Act*, RSNL 1990, Chapter P-47 (the "*Act*"), as amended; and

IN THE MATTER OF a General Rate Application filed by Newfoundland Power Inc. to establish customer electricity rates for 2019 and 2020.

INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, LOCAL 1620'S WITNESS LIST

The International Brotherhood of Electrical Workers, Local 1620 ("IBEW, Local 1620") currently expects to call the following witness in this proceeding:

1. Mr. Don Murphy, IBEW, Local 1620 Business Manager and Financial Secretary.

IBEW, Local 1620 reserves the right to call further or other witnesses as is considered appropriate to address issues and/or matters arising.

DATED at St. John's, Newfoundland and Labrador, this η day of October 2018.

MARK MURRAY Counsel for the IBEW, Local 1620

IN THE MATTER OF

the *Electrical Power Control Act, 1994*, SNL 1994, Chapter E-5.1 (the "*EPCA*") and the *Public Utilities Act*, RSNL 1990, Chapter P-47 (the "*Act*"), as amended; and

IN THE MATTER OF a General Rate Application filed by Newfoundland Power Inc. to establish customer electricity rates for 2019 and 2020.

INTERNATIONAL BROTHERHOOD OF ELECTRICAL WORKERS, LOCAL 1620'S ISSUES LIST

In the International Brotherhood of Electrical Workers, Local 1620 ("IBEW, Local 1620") submissions, the issues arising in the proceeding are as follows:

- 1. Executive Compensation;
- 2. Non-unionized workforce compensation;
- 3. Unionized workforce compensation;
- 4. Newfoundland Power's application for a proposed 9.5% rate of return on equity; and
- 5. Such other issues as may arise.

DATED at St. John's, Newfoundland and Labrador, this

day of October 2018.

MARK MURRAY Counsel for the IBEW, Local 1620