

NEWFOUNDLAND AND LABRADOR
BOARD OF COMMISSIONERS OF PUBLIC UTILITIES
120 Torbay Road, P.O. Box 21040, St. John's, Newfoundland and Labrador, Canada, A1A 5B2

Transcript of Public Hearing

**Newfoundland Power Inc.
2025-2026 General Rate Application**

February 1, 2024

PRESENT:

The Board:

Kevin Fagan, Chair and CEO
Dwanda Newman, LL.B, Vice -Chair
John O'Brien, FCPA, FCA, CISA, Commissioner

Present on behalf of the Board:

Jacqueline Glynn, Board Counsel
Jo Galarneau, Board Secretary

Present for Newfoundland Power Inc.

Lindsay Hollett, Counsel
Liam O'Brien, Counsel

Present for Newfoundland and Labrador Hydro:

Shirley Walsh Counsel
Michael Ladha, KC, Counsel
Dan Simmons, KC, Counsel

Present for Consumer Advocate:

Dennis Browne, KC
Stephen Fitzgerald, KC, Counsel

Present for IBEW Local 1620:

Adrienne Ding, Counsel
Justin King, Counsel

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1 CHAIR:
 2 I'd like to welcome everyone here to the
 3 pre-hearing conference for Newfoundland
 4 Power's 2025 – 2026 General Rate
 5 Application. My name is Kevin Fagan, I'm
 6 the Chair and CEO of the Board and a
 7 presiding member for this proceeding. Other
 8 Board members join me on the panel are
 9 Dwanda Newman, Vice Chair; and John O'Brien,
 10 Commissioner. We also have assistance,
 11 Maureen Greene, our Board hearing counsel,
 12 Maureen is not with us here today. She will
 13 be here for the hearing. Jacqueline Glynn,
 14 our board counsel, Joanne Galarneau, our
 15 executive director and Board secretary. At
 16 the back of the room we also have Board
 17 staff. We have Stephanie Stack our newest
 18 addition, the assistant board secretary.
 19 Mike McNiven, regulatory advisor, Mike
 20 Janes, engineering advisor and Kim Simms,
 21 financial advisor. The pre-hearing
 22 conference is being recorded by Glenda
 23 Gibbons with Discoveries Unlimited, under
 24 the supervision of the Board secretary and
 25 will be transcribed and distributed

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1 electronically following the proceeding.
 2 I'd like to welcome the parties and any
 3 interested members of the public who are
 4 here and the media as well. The purpose of
 5 the pre-hearing conference is really to
 6 assist with the organization and planning of
 7 the public hearing into Newfoundland Power's
 8 2025 – 2025 General Rate Application. At
 9 this point in time I will ask Board counsel,
 10 Jacqui Glynn to enter the matter and confirm
 11 issuance of the appropriate public notices,
 12 the application and the pre-hearing
 13 conference we're holding today.
 14 MS. GLYNN:
 15 Thank you, Mr. Chair, good morning to
 16 everybody. On December 12th, 2023, the Board
 17 received a General Rate Application from
 18 Newfoundland Power to establish new rates
 19 for its customers. Newfoundland Power is
 20 requesting that the Board approve, among
 21 other things, an overall average increase in
 22 current electricity rates of 5.5 percent as
 23 of July 1, 2025. Notice of the application
 24 and the pre-hearing conference was placed on
 25 the Board's website and published in

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1 newspapers throughout the province starting
 2 on June 12th—oh, I have the wrong date there,
 3 sorry, the notice was published in The
 4 Telegram and The West Coast Wire. The
 5 notice advised a full recovery of
 6 Newfoundland Power's costs, including the
 7 forecast could result in a significantly
 8 higher increase in customer rates than the
 9 5.5 included in the application.
 10 CHAIR:
 11 Thank you very much. In the public notice
 12 itself there was an invite for intervenor
 13 submissions and I will call upon Board
 14 counsel again to confirm the request had
 15 been received to intervene and request to
 16 make submissions in accordance with the
 17 public notice.
 18 MS. GLYNN:
 19 Thank you. The deadline for filing of
 20 interventions was January 24th, 2024. The
 21 Board has received three intervenor
 22 submissions, one from the Consumer Advocate,
 23 one from Newfoundland and Labrador Hydro and
 24 one from the International Brotherhood of
 25 Electrical Workers, Local 1620. Counsel for

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1 the intervenors will introduce themselves
 2 once we confirm that there are no other
 3 intervenors, but I don't see any other
 4 parties here, we can still ask, Mr. Chair.
 5 CHAIR:
 6 Sure, thank you. So are there any other
 7 parties present here today to give notice of
 8 their intention to intervene in the hearing
 9 who haven't already done so? I'll take that
 10 as a no, so we'll move on. So I'd like to
 11 ask each party here today to identify and
 12 introduce yourself and indicate in what
 13 capacity you will be participating in in the
 14 hearing and let's begin with Newfoundland
 15 Power again.
 16 MR. O'BRIEN:
 17 Good morning, Mr. Chair, Commissioners.
 18 Liam O'Brien here as outside counsel for
 19 Newfoundland Power and with me is Lindsay
 20 Hollett, inside counsel for Newfoundland
 21 Power.
 22 CHAIR:
 23 Consumer Advocate?
 24 FITZGERALD, K.C.:
 25 Good morning, Mr. Chair and other

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1 Commissioners. It's Steve Fitzgerald
 2 appearing for the Consumer Advocate.
 3 CHAIR:
 4 Newfoundland and Labrador Hydro?
 5 MS. WALSH:
 6 Good morning, Mr. Chair, Commissioners. I'm
 7 Shirley Walsh, I am inside counsel for
 8 Newfoundland and Labrador Hydro and with me
 9 is Michael Latha our vice-president and
 10 chief legal officer and Dan Simmons who will
 11 be our external legal counsel.
 12 CHAIR:
 13 IBEW?
 14 MR. KING:
 15 Good morning Chair and Commissioners.
 16 Justice King on behalf of IBEW 1620 and with
 17 me is Adrienne Ding is also going to be
 18 counsel.
 19 CHAIR:
 20 Thank you. Next on the agenda is the
 21 schedule. I believe there's been ongoing
 22 discussions with the parties in the matter
 23 and I will call upon Board counsel to
 24 provide a progress update.
 25 MS. GLYNN:

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1 So we have followed the process, the
 2 regulatory process for recent general rate
 3 reviews and that process includes two rounds
 4 of requests for information, filing of
 5 expert reports and then RFIs on the expert
 6 reports. We have also included a specified
 7 period of time for negotiation discussions
 8 before the hearing. The dates and the order
 9 of the witnesses for the hearing, as well as
 10 dates for public participation dates will be
 11 determined at a later date once the issues
 12 are explored and discussed further. The
 13 parties are in agreement with the schedule
 14 of dates with some conditions about other
 15 regulatory matters that may impact our
 16 schedule. Subject to any comments from the
 17 parties, it can be accepted as presented to
 18 the Board, I believe all the members have a
 19 copy before them, as well as the parties
 20 have a copy before them.
 21 CHAIR:
 22 I'll just call on each party to state their
 23 position on the schedule. Newfoundland
 24 Power, please?
 25 MR. O'BRIEN:

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1 We're in agreement with the schedule as
 2 proposed, Mr. Chair.
 3 CHAIR:
 4 Consumer Advocate?
 5 BROWNE, K.C.:
 6 Yeah, I'm going to speak to that for a
 7 second because the schedule deals with the
 8 application that has been advertised by the
 9 Board, the proposed increase in the
 10 Company's return on equity from 8.5 percent
 11 to 9.8 percent, an increase in cost since
 12 its last rate application, the issues
 13 relating to these costs; however, when the
 14 ratepayers were notified publicly by
 15 Newfoundland Power of this hearing,
 16 ratepayers were told that there were also
 17 another application as part of the General
 18 Rate Application, they have it in their
 19 press release, which you're all familiar,
 20 which has now been put into a rate base
 21 application where Newfoundland Power is also
 22 seeking an addition, I guess, 1.8 percent,
 23 thereabouts, effective July 1, 2024. So,
 24 that's there, it's still being dealt with by
 25 the Board, but it's not mentioned in the

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1 Notice of Application that this is something
 2 that can affect ratepayers, that they're
 3 looking for a rate increase where
 4 Newfoundland Power framed it as part of
 5 their General Rate Application in their
 6 notification to the public. So we're just
 7 concerned that that rate base application is
 8 moving along really unbeknownst publicly, I
 9 guess, to ratepayers because the focus,
 10 according to the Board, is the 8.5 percent
 11 to the 9.85 percent, but clearly there is
 12 another application out there that is
 13 affecting ratepayers and will affect their
 14 rates. Currently ratepayers are paying 13.2
 15 cents a kilowatt. So we're concerned about
 16 how that other application, the Rate Base
 17 Application we'll call it, affects this
 18 General Rate Application because we're into
 19 costing and costing issues which will
 20 overlap into the Rate Base Application. The
 21 Rate Base Application is ongoing, but yet
 22 we're having a pre-hearing conference today
 23 on the General Rate Application without
 24 knowing exactly what's happening with that.
 25 So we're concerned and we're also concerned

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1 that ratepayers are not being given
 2 sufficient information to make a
 3 determination in reference to these
 4 applications, and yet, they're invited to
 5 participate, they're invited for intervenor
 6 submission, but what information are they
 7 being given. Newfoundland Power in its
 8 press release told ratepayers they're
 9 looking for an overall average increase of
 10 approximately 1.5 percent or a dollar fifty
 11 on a hundred dollar electricity bill
 12 effective July 1, 2024. They are also
 13 looking for an overall average increase of
 14 approximately 5.5 percent or 5.50 on a
 15 hundred dollar electric bill effective July
 16 1, 2025. That information means absolutely
 17 nothing to ratepayers. And it suggests a
 18 certain liberty that the regulated company
 19 is taking with ratepayers. They're not
 20 informing ratepayers in their press release
 21 of what they're looking for. They're not
 22 informing them how many more millions
 23 they're looking for that would go to their
 24 shareholder, and they're sort of suggesting,
 25 if you read it all, yeah, we're getting more

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1 on our rate of return, but we're also doing
 2 A, B, C, D, some of which is already dealt
 3 with in Capital Budget Applications, so I
 4 won't say it's misleading, I'll say that
 5 it's selectively providing information. We
 6 see a time in the not too distant future
 7 where this Board will require the regulated
 8 company to put in how many more millions
 9 they're looking for and to state exactly how
 10 much is going to the ratepayer and how much
 11 is going to their shareholder. And we know
 12 just from the questions we asked in this
 13 particular instance the shareholder is
 14 getting 47.5 million annually, that's what
 15 they're getting, that's what they're taking
 16 home out of it, nearly 4 million a month,
 17 but it seems to me that when you look at
 18 both these applications, that the
 19 shareholder will be getting considerably
 20 more, at least another 9 million the
 21 shareholder will take home if these are
 22 successful. Ratepayers should be told and
 23 given this information so they can make an
 24 informed choice, so that's my point there.
 25 I also have other issues I want to raise

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1 which I want to bring to the Board's
 2 attention we will be looking for, but
 3 initially on what the Board got out there
 4 and what Newfoundland Power got out there,
 5 it doesn't serve the ratepayer very well.
 6 Those are my comments on that.
 7 CHAIR:
 8 With respect to the schedule, you're okay
 9 with respect to the schedule thus far, Mr.
 10 Browne?
 11 BROWNE, K.C.:
 12 Subject to these comments because we don't
 13 know what will happen with the Rate Base
 14 Application or if the Board would see fit to
 15 increase rates while Newfoundland Power is
 16 already getting a rate of return. It seems
 17 a peculiar application in any case,
 18 Newfoundland Power is having trouble with
 19 its cost control apparently, so therefore,
 20 they're running to the Board. At the same
 21 time they have a General Rate Application on
 22 the go. It seems to be a different twist
 23 from what I have seen previously. We all
 24 know in July and ratepayers do know that
 25 there will be a bump, perhaps in electricity

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1 rates depending on the amount of fuel that's
 2 being consumed at Holyrood. Ratepayers are
 3 already paying 13.2 cents. We have a
 4 government that stated publicly they don't
 5 want electricity rates going any more than
 6 14.5, 15 cents, and yet we have all this on
 7 the go, so I'm just concerned that the
 8 schedule that's there will be adequate to
 9 address our concerns as this unfolds.
 10 CHAIR:
 11 Yes, I think we will have to monitor it,
 12 obviously. I think after we conclude the
 13 opinions on the schedule, we'll probably
 14 give Newfoundland Power an opportunity to
 15 respond to some of your comments with regard
 16 to the proposals and stuff, but I know
 17 certainly Newfoundland Power's original
 18 filing of the application had both requests
 19 in the original application. It was for
 20 clarity of process and timing trying to deal
 21 with the requests that the Board actually
 22 split the application, so it was more, say
 23 the fact that you're trying to deal with a
 24 2024 increase and the time required to deal
 25 with a General Rate Application, it wouldn't

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1 have been effective or efficient, I think,
 2 to try and package it all in one. So the
 3 Board split the two and certainly there will
 4 be proper process on the return application,
 5 but I understand your concerns with regard
 6 to confusion with two applications ongoing
 7 at once. That's certainly a challenge, but
 8 with regard to the communications on the
 9 application, we'll give Newfoundland Power a
 10 chance to respond on that once we conclude
 11 the opinions on the schedule, if that's
 12 okay. Okay, so we'll move along to
 13 Newfoundland and Labrador Hydro's position
 14 on the schedule?
 15 MS. WALSH:
 16 We have no objections to the schedule.
 17 CHAIR:
 18 The IBEW?
 19 MR. KING:
 20 No issues with the schedule.
 21 CHAIR:
 22 All right, so before we move on to rules of
 23 procedure, Newfoundland Power would you like
 24 to comment on the Consumer Advocate's
 25 concerns?

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1 MR. O'BRIEN:
 2 Just briefly, Mr. Chair, just to say that, I
 3 guess first of all I understand the purpose
 4 of the process here today is to look at
 5 scheduling, look at rules of procedure in
 6 order to proceed towards a hearing, so it's
 7 not my intent to present an introductory
 8 statement on behalf of Newfoundland Power at
 9 this point in time and I know issues that
 10 the Consumer Advocate will raise will be
 11 flushed out in due time and we will present
 12 our positions on those consistent with
 13 what's been filed with the Board. I do take
 14 your comments in terms of the separating out
 15 of the two, the 2024 Rate Base Application
 16 from the 2025 – 2026 GRA for efficiency
 17 purposes and I guess in order to have some
 18 clarity with that process so that
 19 Newfoundland Power has followed that process
 20 at the request of the Board. We do feel
 21 that the notice that has been given to the
 22 public is consistent with the manner in
 23 which the notice has been given in the past,
 24 so if there is instruction from the Board on
 25 that, Newfoundland Power is more than happy

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1 to consider instruction from the Board on
 2 notice going forward on appropriate steps to
 3 take, so at this stage that's really all I
 4 can add, I think, to the Consumer Advocate's
 5 comments on that.
 6 CHAIR:
 7 Thank you. So next on the agenda is rules
 8 of procedure. Newfoundland Power, can you
 9 state your position on rules of procedure?
 10 MR. O'BRIEN:
 11 We're satisfied with the rules as presented
 12 to the Board, Mr. Chair.
 13 CHAIR:
 14 Consumer Advocate, your position on the
 15 rules of procedure?
 16 FITZGERALD, K.C.:
 17 We have no issues with the rules of
 18 procedure.
 19 CHAIR:
 20 All right, thank you. Newfoundland and
 21 Labrador Hydro?
 22 MS. WALSH:
 23 We have no issues with the rules.
 24 CHAIR:
 25 And the IBEW?

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1 MR. KING:
 2 No issues with the rules.
 3 CHAIR:
 4 Thank you. Does the Board counsel have any
 5 additional comments in these matters or any
 6 other matters that need to be dealt with
 7 here today?
 8 MS. GLYNN:
 9 No, Mr. Chair, nothing further.
 10 CHAIR:
 11 All right, before we conclude, I just want
 12 to give a brief introduction with respect to
 13 the process of establishing customer rates
 14 and then touch on the issues before the
 15 Board in its current General Rate
 16 Application of Newfoundland Power. So
 17 electrical services in the Province of
 18 Newfoundland and Labrador are provided by
 19 two utilities: Newfoundland and Labrador
 20 Hydro is a crown corporation; and
 21 Newfoundland Power, an investor-owned
 22 subsidiary of Fortis Inc. Newfoundland and
 23 Labrador Hydro is principally responsible
 24 for generation and transmission in the
 25 province with a relatively small amount of

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<p>1 distribution in rural areas. Newfoundland 2 Power operates on the island portion of the 3 province, and is primarily a distribution 4 utility with some generating capacity. 5 Newfoundland Power serves approximately 87 6 percent of electricity to consumers in the 7 province and purchases approximately 93 8 percent of its energy supply from 9 Newfoundland and Labrador Hydro. 10 The power policy of the province is set 11 forth in the Electrical Power Control Act, 12 EPCA. In summary, the EPCA mandates the 13 Board to make rate decisions that are 14 reasonable and not unjustly discriminatory. 15 Rates are to be based on forecast costs for 16 the supply power for one or more years. 17 This timeframe in practice is generally 18 referred to as the “test year(s)”. The 19 legislation also ensures that utilities are 20 permitted to earn a just and reasonable 21 return while maintaining a sound credit 22 rating to financial markets of the world. 23 The legislation calls for the most efficient 24 production, transmission and distribution of 25 power that will afford consumers the lowest</p>	<p>1 reflected in customer rates which are 2 intended to provide the utility a reasonable 3 opportunity to recover its future costs. 4 For example, operating costs, depreciation, 5 finance costs, return on equity and supply 6 costs. The utility is required to manage 7 its operations without additional rate 8 relief until its next General Rate 9 Application. 10 As most parties are aware, customer 11 rates are also updated July 1st each year. 12 The annual rate change has been 13 predominantly to enable utilities 14 historically to recover variations in fuel 15 costs. The process of approving July 1st 16 customer rates, as a result of the operation 17 of the Rate Stabilization Plan for 18 Newfoundland and Labrador Hydro and the Rate 19 Stabilization Account for Newfoundland Power 20 does not include a review of the utilities 21 overall cost management. The regulatory 22 process for the annual July 1st rate updates 23 ensures these cost changes in customer rates 24 are strictly for addressing the disposition 25 of permitted cost variances. Now that’s</p>
<p>Page 18</p> <p>1 possible cost electricity consistent 2 reliable service. The EPCA was recently 3 revised to also require power to be 4 delivered to consumers on an environmentally 5 responsible manner. 6 General rate proceedings are held by 7 both Newfoundland Power and Newfoundland 8 Hydro approximately every three years. 9 Through this regulatory process, the Board 10 evaluates the reasonableness of the cost 11 recovered and whether the proposed customer 12 rates are fair and non-discriminatory. To 13 valuate the reasonableness of the proposals 14 presented by the utilities, the Board 15 applies tests consistent with general 16 accepted utility practice. At the 17 conclusion of the general rate application 18 process, the Board issues an order which 19 sets forth the Board’s decisions on the 20 utility proposals. 21 The overall cost management of the 22 utilities is reviewed by the Board in 23 General Rate Applications. The Board’s 24 decision resulting from the General Rate 25 Application approves the cost to be</p>	<p>Page 20</p> <p>1 generally fuel cost, but the issue of the 2 Rate of Return Application of Newfoundland 3 Power is somewhat similar. It’s a single 4 item review of costs that was approved by 5 the Board to be when costs were outside of a 6 certain range to come back with an 7 application, so the review of that 8 proceeding will be strictly on that matter 9 alone and not on the overall cost management 10 of the utility, so similar to the July 1st 11 rate changes, but it would get due diligence 12 and review and make sure it’s complying with 13 the Board’s requirements before it’s passed 14 through. With respect to the current 15 Newfoundland Power General Rate Application, 16 Newfoundland Power is proposing that the 17 Board approve, amongst other things, an 18 average increase in electricity rates of 5.5 19 percent to become effective July 1, 2025. 20 Newfoundland Power indicates the 21 proposed rate increase is primarily the 22 result of an increase in the company’s 23 return on equity from 8.5 percent to 9.85 24 percent; and increases in its costs since 25 the last General Rate Application.</p>

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1 Full recovery of Newfoundland Power's
 2 costs, including forecast supply costs,
 3 could result in significantly higher
 4 increase in customer rates than 5.5 percent.
 5 This is because Newfoundland Power is
 6 proposing a portion of its supply costs for
 7 the years 2025 and 2026 be temporarily
 8 deferred with recovery planned through
 9 customer rate increase through the required
 10 July 1st Rate Stabilization rate updates for
 11 2026 and 2027.
 12 The outcomes of the Board's decisions
 13 on this application are very important to
 14 the customers of Newfoundland Power and the
 15 customers of Newfoundland and Labrador Hydro
 16 whose rates change in step with those of
 17 Newfoundland Power. Further notice will be
 18 issued in advance of the start of the
 19 hearing. The Board plans to hold a public
 20 participation day so that the public and
 21 representatives of the community and
 22 business groups can express their views on
 23 the application. The Board benefits from
 24 hearing from the public in dealing with
 25 General Rate Applications. Are there any

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1 final remarks from the parties?
 2 Newfoundland Power?
 3 MR. O'BRIEN:
 4 Nothing from Newfoundland Power, thank you
 5 Mr. Chair.
 6 BROWNE, K.C.:
 7 Just our only comment is on May 1 we're
 8 supposed to provide a witness list and
 9 issues list. The witness list and the
 10 issues list could involve our retention of
 11 other experts to deal with some of the
 12 issues we're raising because we're raising,
 13 as we discussed in our counsel meeting
 14 yesterday, quite a number of issues for this
 15 Board to deal with this time round. So I'm
 16 just putting that caveat on that schedule
 17 that we informed counsel yesterday at our
 18 meeting the day before, that we do not quite
 19 know how many experts we will be calling,
 20 but we will be calling sufficient to deal
 21 with the issues that we see as imperative
 22 for the Board to deal with before Muskrat
 23 Falls costs are brought on.
 24 CHAIR:
 25 That's fair, Mr. Browne, and the Board will

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1 certainly do everything it can to
 2 accommodate, you know, the opportunity to
 3 provide expert evidence where it sees
 4 necessary.
 5 BROWNE, K.C.:
 6 Thank you, Chair.
 7 MR. O'BRIEN:
 8 Mr. Chair, I wonder if I could comment just
 9 on that point. There is an April 17th
 10 requirement that expert reports and evidence
 11 be filed on that date, so that would be in
 12 advance of Mr. Browne's May 1st date, witness
 13 list, so if there are experts going to be—
 14 based on this schedule, if there's experts'
 15 evidence going to be filed, it would be
 16 filed by the 17th of April, so that may be
 17 the date he has an issue with, as opposed to
 18 the May 1st date.
 19 BROWNE, K.C.:
 20 I take your point, we will be able to do it
 21 by April 17th we will know what experts we
 22 are calling.
 23 MR. O'BRIEN:
 24 So we should be fine with the May 1st date
 25 then for issue for witness list.

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1 CHAIR:
 2 Yeah, I assume the response to the request
 3 for information and stuff should lead us
 4 down the path of determining, you know,
 5 clarity on issues where experts are
 6 required.
 7 MR. O'BRIEN:
 8 I take your point on that.
 9 MS. GLYNN:
 10 And I'll just jump in there that there will
 11 certainly be discussion amongst legal
 12 counsel for the parties and for the Board as
 13 the process progresses and we did discuss
 14 that we would have some further discussion
 15 on the experts that will be presented by
 16 each of the parties, the Board included.
 17 CHAIR:
 18 Yes, thank you, Jacqui. If things are not
 19 set in stone from that perspective, so we
 20 may have to be flexible at some point, but
 21 we'll do our best to try and meet the
 22 timelines. I don't think any of us want to
 23 be here the summer in July or August, so it
 24 would be really good to stick with the
 25 process, the timelines as best we can.

1 Newfoundland and Labrador Hydro?
 2 MS. WALSH:
 3 No further comments.
 4 CHAIR:
 5 IBEW?
 6 MR. KING:
 7 Nothing further.
 8 CHAIR:
 9 Well I think Jacqui may have jumped in, any
 10 final remarks from you?
 11 MS. GLYNN:
 12 Nothing else from me.
 13 CHAIR:
 14 Okay, so this concludes the pre-hearing
 15 conference and the matter is adjourned. The
 16 Board will be issuing an order accordingly
 17 and thanks very much everybody for
 18 attending. I look forward to seeing you all
 19 at the hearing, thank you.
 20 Upon conclusion at 10:30 a.m.
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CERTIFICATE

I, Judy Moss, hereby certify that the foregoing is a true and correct transcript of Pre-Hearing Conference in the matter of Newfoundland Power Inc. 2025-2026 General Rate Application heard on February 1st, 2024 before the Newfoundland and Labrador Board of Commissioners of Public Utilities, 120 Torbay Road, St. John's, Newfoundland and Labrador and was transcribed by me to the best of my ability by means of a sound apparatus.

Dated at St. John's, Newfoundland and Labrador this 1st day of February, 2024

Judy Moss

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