

Aluminium  
400-1190 Avenue des Canadiens-de-Montréal  
Montreal (Quebec) H3B 0E3  
Canada  
T +1 (514) 848 1406

**BY EMAIL**

September 6, 2018

Ms. Cheryl Blundon  
Director Corporate Services & Board Secretary  
**Board of Commissioners of Public Utilities**  
Prince Charles Building  
120 Torbay Road, P.O. Box 21040  
St. John's, NL A1A 5B2  
email: [cblundon@pub.nl.ca](mailto:cblundon@pub.nl.ca)

**Re: Newfoundland and Labrador Hydro (“NLH”) Application for Approval of Capital Expenditures to Upgrade the Happy Valley-Goose Bay Distribution System**  
**Submissions of Iron Ore Company of Canada (“IOC”)**

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Dear Ms. Blundon:

Further to the Board's procedural letter dated August 10, 2018 in the above-mentioned application, please find enclosed the representations of IOC.

On August 3, 2018<sup>1</sup>, NLH applied for an Order pursuant to section 41(3) of the Public Utilities Act for the Board to approve upgrades on the Happy Valley-Goose Bay Distribution System, at an estimated capital cost of \$195,400.

On August 24, 2018, IOC addressed four requests for information to NLH to gain a more complete understanding of the challenge NLH seeks to address with the proposed capital investment. NLH provided answers to IOC on August 31, 2018.

**RFIs**

IOC respectfully submits that answers IOC-NLH-001 and IOC-NLH-002 are unresponsive.

In IOC-NLH-001, IOC sought to ascertain the peak load on the Distribution system. Although the capacity of the system does vary according to system conditions, NLH avoids answering the question. NLH did manage to identify the load on the different segments of the system and does claim that it is constrained. NLH's assessment is likely based on a certain set of assumptions and IOC's question did not ask NLH to vary those assumptions. A more forthright answer would likely have helped the Board determine the nature of the alleged challenge faced by NLH and put the proposed solution into perspective.

At this stage, and considering the small amount at stake, IOC does not believe that it should pursue this line of inquiry or engage engineering resources to gain more clarity.

Similarly, IOC-NLH-002 is straight forward. It asked whether the table referred to in evidence indicates the priority load in each area. The question should have first been answered by a

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<sup>1</sup> Corrected on August 6, 2018.

clear yes or no. In that respect, the first line of the NLH's answer is clear, although not the answer to the question asked. The rest of the answer on the effort and desire to separate priority and non-priority customers in a specific area is a debate that was not raised by IOC.

Again, in the circumstances, IOC does not desire to investigate further.

### Submissions

NLH cannot currently serve new loads on the Labrador East transmission system. In its Order P.U. 9 (2018) the Board ordered NLH to complete a full expansion study to assess the options for the Labrador interconnected system and ordered NLH to file a network addition policy to address the consequences of growth on its ratepayers.<sup>2</sup>

Meanwhile, NLH has engaged into a number of short and medium term activities to maintain its service over the coming winter, such as those described in the pending application.

Considering the record before the Board, IOC cannot comment more specifically on the actions proposed by NLH. IOC therefore raises no objection to the capital budget request formulated by NLH in its application.

IOC believes that the long term solution to the challenge faced by the Labrador communities will become clearer once NLH has completed its system study due in the coming fall and once a network addition policy has been adopted, as prescribed by the Board in Order P.U. 9 (2018).

Respectfully submitted,



Benoit Pepin  
Director Energy, North America  
Aluminium

c.c.: NLH  
Interested parties

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<sup>2</sup> Order P.U. 9 (2018), page 9.