

June 15, 2015

**VIA COURIER and ELECTRONIC MAIL**

Ms. G. Cheryl Blundon, Board Secretary  
Board of Commissioners of Public Utilities  
120 Torbay Road  
P.O. Box 21040  
St. John's, NL A1A 5B2

Dear Ms. Blundon:

**RE: 2013 Amended General Rate Application of Newfoundland and Labrador Hydro**

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Enclosed are the original and twelve (12) copies of Vale's RFIs on Expert Evidence filed in respect of the above-noted Application.

We have provided a copy of this correspondence together with enclosures to all concerned parties.

We trust you will find the enclosed satisfactory.

Yours faithfully,



Thomas J. O'Reilly, Q.C.

TJOR/js  
Encl.

c.c. Geoffrey P. Young, Newfoundland & Labrador Hydro  
Gerard Hayes, Newfoundland Power  
Thomas J. Johnson, O'Dea, Earle  
Paul Coxworthy, Stewart McKelvey  
Dennis Browne, Q.C., Browne Fitzgerald Morgan & Avis  
Nancy Kleer, Olthuis, Leer, Townshend LLP  
Yvonne Jones, MP Labrador  
Genevieve M. Dawson, Benson Buffett

**Thomas J. O'Reilly, Q.C.** | Partner

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IN THE MATTER OF the *Public Utilities Act*,  
R.S.N.L. 1990, Chapter P-47 (the "Act"), and

IN THE MATTER OF a General Rate  
Application (the Amended Application) by  
Newfoundland and Labrador Hydro for  
approvals of, under Sections 70 and 75 of  
the Act, changes in the rates to be charged  
for the supply of power and energy to  
Newfoundland Power, Rural Customers and  
Industrial Customers; and under Section 71  
of the Act, changes in the Rules and  
Regulations applicable to the supply of  
electricity to Rural Customers.

REQUESTS FOR INFORMATION ON EXPERT EVIDENCE  
VALE NEWFOUNDLAND & LABRADOR LIMITED

V-IC-001 and V-CA-001 to V-CA-003

Issued June 15, 2015

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**V-IC-001** Reference: Pre-filed Testimony of Mr. P. Bowman and Mr. Hamil  
Najmidinov. Section 5.0, footnote 65, page 30

With regard to the classification of wind generation to 100% energy, P.  
Bowman and H. Najmidinov state in footnote 65 that "*..... properly  
analyzed wind does provide some capacity benefit in terms of LOLH*".  
Please explain this statement more fully and provide any applicable  
citations.

**V-CA-001** C. Douglas Bowman, Section 1.c: Summary of Evidence, page 4, line 23  
to page 5, line 4

Does Mr. D. Bowman acknowledge that Hydro administered the load  
variation component of the RSP from 2007 until Aug 31, 2013 in  
accordance with Board Order P.U. 8(2007)?

- 1 **V-CA-002** Reference: C. Douglas Bowman, Section 1.c: Summary of Evidence,  
2 page 4, line 23 to page 5, line 4  
3 Reference: 2006 GRA Parties' Agreement of October 20, 2006 and  
4 November 23, 2006, <http://www.pub.nf.ca/hydro2006gra/index.htm>
- 5 Does Mr. D. Bowman acknowledge that the Consumer Advocate signed  
6 the Parties' Agreements referenced above which included the  
7 methodology for the RSP?
- 8 **V-CA-003** Reference: C. Douglas Bowman, Section 1.c: Summary of Evidence,  
9 page 4, line 23 to page 5, line 4  
10 Reference: NLH 2013 Interim Rates Application IR-V-NLH-006
- 11 Does Mr. D. Bowman acknowledge that in the August 2013 RSP report,  
12 that an amount of \$160,749,555 was removed from the load variation  
13 of the IC RSP and also that an amount of \$112,573,325 was allocated  
14 to the NP RSP?

DATED at St. John's, in the Province of Newfoundland and Labrador, this 15<sup>th</sup> day of June, 2015.

COX & PALMER

Per:   
Thomas J. O'Reilly, Q.C.

TO: The Board of Commissioners of Public Utilities  
Suite E210, Prince Charles Building  
120 Torbay Road  
P. O. Box 21040  
St. John's, NL A1A 5B2  
Attention: Board Secretary

TO: Newfoundland & Labrador Hydro  
P. O. Box 12400  
500 Columbus Drive  
St. John's, NL A1B 4K7  
Attention: Geoffrey P. Young  
Senior Legal Counsel

- TO: Newfoundland Power  
P. O. Box 8910  
55 Kenmount Road  
St. John's, NL A1B 3P6  
Attention: Gerard Hayes  
Senior Legal Counsel
- TO: Thomas J. Johnson, Consumer Advocate  
O'Dea, Earle  
323 Duckworth Street  
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- TO: Stewart McKelvey  
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Attention: Paul Coxworthy
- TO: Miller & Hearn  
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Labrador City, NL A2V 2K3  
Attention: Edward M. Hearn, Q.C.
- TO: Olthuis, Leer, Townshend LLP  
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