

May 3, 2022

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

Attention: Ms. Cheryl Blundon
Director of Corporate Services & Board Secretary

Dear Ms. Blundon:

Re: Application for Exemption to Regulation 17 – Temporary Restriction for Load Additions in Labrador East and West and Approval of an Upstream Capacity Charge pursuant to the Network Additions Policy – Wabush Airport – Hydro's Reply

On April 4, 2022, Newfoundland and Labrador Hydro ("Hydro") filed an application with the Board of Commissioners of Public Utilities ("Board") requesting approval of an exemption to Regulation 17, which temporarily limits load additions in Labrador East and West. The application further requested approval of an Upstream Capacity Charge related to the customer's application for service, pursuant to Section 8(ii) of the Network Additions Policy ("Application").

Hydro notes that Newfoundland Power Inc. advised that it had no comments on the Application. The Labrador Interconnected Group ("LIG") filed submissions advising of its support of Hydro's Application, but also adding further points for the Board's consideration.

The LIG referenced Hydro's communication to the Board regarding the extent of the requests for service in Labrador received by Hydro after the approval of the Network Additions Policy, and noted the impact that supply for that level of load would have on the Labrador Interconnected System. The LIG suggested that the Board should consider those impacts in another proceeding, such as the *Reliability and Resource Adequacy Study Review*. Hydro agrees that the requests for load additions are significant and has previously committed to address and review the impacts of those requests in the context of the ongoing *Reliability and Resource Adequacy Study Review*.¹

The LIG also urged Hydro to consider the Government of Canada's 2030 Emissions Plan. Hydro is familiar with that plan, and with the federal government's support of clean electrification solutions. Hydro fully supports these solutions, whenever they can be reasonably used, and in Hydro's case, whenever they present as contributing to least-cost reliable service.

There were no comments forthcoming from any other party. Hydro respectfully requests that the Board approve Hydro's Application as submitted.

¹ "Network Additions Policy – Implementation Update," Newfoundland and Labrador Hydro, February 3, 2022, pp. 2–3.

Ms. C. Blundon
Public Utilities Board

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Should you have any questions, please contact the undersigned.

Yours truly,

NEWFOUNDLAND AND LABRADOR HYDRO



Shirley A. Walsh
Senior Legal Counsel, Regulatory
SAW/kd

ecc:

Board of Commissioners of Public Utilities

Jacqui H. Glynn
PUB Official Email

Consumer Advocate

Dennis M. Browne, QC, Browne Fitzgerald Morgan & Avis
Stephen F. Fitzgerald, Browne Fitzgerald Morgan & Avis
Sarah G. Fitzgerald, Browne Fitzgerald Morgan & Avis
Bernice Bailey, Browne Fitzgerald Morgan & Avis
Bernard M. Coffey, QC

Labrador Interconnected Group

Senwung F. Luk, Olthuis Kleer Townshend LLP
Joshua H. Favel, Olthuis Kleer Townshend LLP

Newfoundland Power Inc.

Dominic J. Foley
Lindsay S.A. Hollett
Regulatory Email

Iron Ore Company of Canada

Gregory A.C. Moores, Stewart McKelvey

Island Industrial Customer Group

Paul L. Coxworthy, Stewart McKelvey
Denis J. Fleming, Cox & Palmer
Dean A. Porter, Poole Althouse