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July 29, 2022

Board of Commissioners of Public Utilities
Prince Charles Building
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Attention: Ms. Cheryl Blundon
Director of Corporate Services and Board Secretary

Re: Newfoundland and Labrador Hydro - Approvals Required to Execute Programming Identified in the Electrification, Conservation and Demand Management Plan 2021-2025 Application; and Newfoundland Power Inc. - 2021 Electrification, Conservation and Demand Management Application – Hydro's Reply

Newfoundland Power Inc. ("Newfoundland Power") filed its 2021 Electrification, Conservation and Demand Management ("ECDM") Application with the Board of Commissioners of Public Utilities ("Board") on December 16, 2020.¹ On June 16, 2021, Newfoundland and Labrador Hydro ("Hydro") filed its Application for Approvals Required to Execute Programming Identified in the Electrification, Conservation and Demand Management Plan 2021-2025 ("Hydro's Application").²

Both Hydro and Newfoundland Power's (collectively "Utilities") applications reflect the Utilities' continued collaboration in developing and delivering customer programs as outlined in the Electrification, Conservation and Demand Management Plan: 2021–2025 ("2021 Plan").³ In addition to these joint efforts on the Island Interconnected System, Hydro's Application also includes proposals relating to its other systems as well as assets constructed in advance of the 2021 Plan.

On August 30, 2021, the Board advised the parties that the Utilities' applications would be joined and proceed as one matter.⁴ The Utilities filed individual responses to requests for information ("RFI") and, on February 1, 2022, jointly provided a technical conference to the parties. Further, in response to the Board's request,⁵ a joint submission by the Utilities⁶ provided a market update. The Consumer Advocate

¹ "2021 Electrification, Conservation and Demand Management Application, Newfoundland Power Inc., December 16, 2020.

² "Application for Approvals Required to Execute Programming Identified in the Electrification, Conservation and Demand Management Plan 2021–2025," Newfoundland and Labrador Hydro, rev. July 8, 2021 (originally filed June 16, 2021).

³ "Application for Approvals Required to Execute Programming Identified in the Electrification, Conservation and Demand Management Plan 2021–2025," Newfoundland and Labrador Hydro, rev. July 8, 2021 (originally filed June 16, 2021), sch 3.

⁴ "Newfoundland and Labrador Hydro – Approvals Required to Execute Programming Identified in the Electrification, Conservation and Demand Management Plan 2021-2025 Application; and Newfoundland Power Inc. - 2021 Electrification, Conservation and Demand Management Application – To Parties – Applications to Proceed as One Matter," Board of Commissioners of Public Utilities, August 30, 2021.

⁵ "Newfoundland and Labrador Hydro - Approvals Required to Execute Programming Identified in the Electrification, Conservation and Demand Management Plan 2021-2025 Application; and Newfoundland Power Inc. - 2021 Electrification, Conservation and Demand Management Application - Request for Market Conditions Update," Board of Commissioners of Public Utilities, June 3, 2022.

⁶ "Newfoundland and Labrador Hydro – Application for Approvals Required to Execute Programming Identified in the Electrification, Conservation and Demand Management Plan 2021-2025; and Newfoundland Power Inc. - 2021 Electrification, Conservation and Demand Management Application – Response to Request for Market Conditions Update," Newfoundland and Labrador Hydro and Newfoundland Power Inc., June 17, 2022.

and Island Industrial Customer Group provided final comments on the Utilities' applications on July 8 and July 15, 2022, respectively.^{7,8}

1.0 HYDRO'S APPLICATION

Hydro's Application sought the following:

- Approval of the use of a Modified Total Resource Cost ("mTRC") test, to complete economic evaluation of customer electrification programs;
- Approval of the ECDM Cost Deferral Account to provide for the deferral of costs related to the implementation of Hydro's ECDM programs for all systems, including Conservation and Demand Management ("CDM") programs for the Labrador Interconnected System;
- Approval of the ECDM Cost Recovery Adjustment to provide for recovery of costs charged to the ECDM Cost Deferral Account; and
- Approval of supplemental 2021 capital expenditures associated with the expansion of Hydro's EV charging network.^{9,10}

1.1 Cost-Effectiveness Testing

The Utilities are proposing the use of the Modified Total Resource Cost ("mTRC") test, supported by a net present value ("NPV") analysis, to evaluate customer electrification programming. To be clear, Hydro's Application does not seek approval of specific electrification programs; rather, Hydro seeks approval of a methodology by which the cost-effectiveness of electrification programming will be evaluated. This approach ensures electrification programming is cost-effective for both participants and non-participants over the long term by allowing the Utilities to adjust programming in response to changing market conditions. For example, the cost differential between electric vehicles ("EV") and gasoline-powered vehicles is expected to decline in the coming years; the approach proposed by the Utilities allows for the modification of electrification programming in response to these anticipated market changes and ensures program cost-effectiveness throughout the term of the 2021 Plan. Hydro submits that this approach is consistent with utility practice in other jurisdictions¹¹ and is therefore consistent with Section 4 of the *Electrical Power Control Act, 1994* ("EPCA").¹²

⁷ "Newfoundland and Labrador Hydro - Approvals Required to Execute Programming Identified in the Electrification, Conservation and Demand Management Plan 2021-2025 Application; and Newfoundland Power Inc. - 2021 Electrification, Conservation," Consumer Advocate, July 8, 2022.

⁸ "Newfoundland and Labrador Hydro – Approvals Required to Execute Programming Identified in the Electrification, Conservation and Demand Management Plan 2021-2025 Application; and Newfoundland Power Inc. – 2021 Electrification, Conservation and Demand Management Application," Island Industrial Customer Group, July 15, 2022.

⁹ On September 17, 2021, the Board advised that the proposed supplemental 2021 EV charging station capital expenditures would be separated from the other proposals in the Utilities' Applications and would be considered on a stand-alone basis. Please refer to "Newfoundland and Labrador Hydro - Approvals Required to Execute Programming Identified in the Electrification, Conservation and Demand Management Plan 2021-2025 Application; and Newfoundland Power Inc. - 2021 Electrification, Conservation and Demand Management Application - To Parties - Responses to Board's correspondence of August 30, 2021, September 9, 2021 and September 13, 2021 - Request for Technical Conference," Board of Commissioners of Public Utilities, September 17, 2021.

¹⁰ The Board approved the capital expenditures proposed by Hydro and Newfoundland Power in *Public Utilities Act*, RSNL 1990, c P-47, Board Order No. P.U. 30(2021), Board of Commissioners of Public Utilities, September 29, 2021.

¹¹ "Application for Approvals Required to Execute Programming Identified in the Electrification, Conservation and Demand Management Plan 2021–2025," Newfoundland and Labrador Hydro, rev. July 8, 2021 (originally filed June 16, 2021), sch 3, sch I.

¹² *Electrical Power Control Act, 1994*, SNL 1994, c E-5.1, s 4.

1.2 Deferral of ECDM Costs including Labrador

Hydro's Application seeks approval of modified deferral account definitions to allow for the deferral and recovery of ECDM programming costs, including those on the Labrador Interconnected System. Hydro submits that an increased emphasis on CDM programming on the Labrador Interconnected System will contribute to maximizing the value of existing capacity, is in the best interest of customers to invest in such programming, and is therefore consistent with Hydro's obligation for least-cost, reliable service in accordance with the *EPCA*. As such, Hydro is proposing modifications to the CDM Cost Deferral Account definition and CDM Cost Recovery Adjustment to permit recovery of Labrador Interconnected System costs from those customers, including their portion of the Rural Deficit allocation related to CDM investments for Hydro Rural customers.

1.3 Deferral of Existing DCFC Operations and Maintenance Costs

Hydro has requested approval to defer the operations and maintenance ("O&M") costs associated with the first 14 Direct Current Fast Chargers ("DCFCs") installed on the Island Interconnected System.¹³ As noted in Hydro's application for approval to install the DCFCs,¹⁴ Hydro is not seeking recovery of the capital costs associated with these chargers or inclusion of the capital cost in rate base. However, Hydro submits that the evidence in this proceeding, including the 2021 Plan, demonstrates the rate-mitigation benefits for customers on the Island Interconnected System of utility investment in EV charging assets. As such, Hydro is proposing to credit revenues and to charge O&M costs associated with its first 14 chargers to its ECDM Cost Deferral Account for recovery on a prospective basis. Hydro believes that the findings of the 2021 Plan and the economic justification of the electrification programs, including utility investment in EV charging infrastructure, support this approach. This approach is also consistent with the findings of the Board in Order No. P.U. 30(2021), Reasons for Decision.¹⁵

1.4 Recovery of New DCFC Capital

In Order No. P.U. 30(2021), the Board approved the construction of 19 new DCFCs, 10 to be constructed by Newfoundland Power and 9 by Hydro; however, as noted by the Board "[t]he issue as to how these costs will be treated for accounting purposes and recovered from customers will be addressed in the subsequent order of the Board related to the Electrification Applications."¹⁶ Hydro's Application proposes to charge the capital costs associated with these 9 DCFC charging sites to the ECDM Cost Deferral Account and recovered through the ECDM Cost Recovery Adjustment. Hydro's proposed deferral account includes a seven-year recovery period for all deferred costs.

¹³ Installation of the DCFCs was approved in Public Utilities Act, RSNL 1990, c P-47, Board Order No. P.U. 7(2020), February 24, 2020.

¹⁴ "Application for Approval of the Construction and Installation of 14 Level 3 Direct Current Fast Chargers and 14 Level 2 Chargers," Newfoundland and Labrador Hydro, December 19, 2019.

¹⁵ "The Board is satisfied that investment by the utilities in EV charging infrastructure is the best currently available tool to contribute to increased EV uptake in the province which will ultimately contribute to increased sales of electricity, increased revenues and, with appropriate load management measures, reduced costs for customers." *Public Utilities Act*, RSNL 1990, c P-47, Reason for Decision - Board Order No. P.U. 30(2021), Board of Commissioners of Public Utilities, October 18, 2021, p. 13/13-17.

¹⁶ *Public Utilities Act*, RSNL 1990, c P-47, Reason for Decision - Board Order No. P.U. 30(2021), Board of Commissioners of Public Utilities, October 18, 2021, p. 13/24-26.

Subsequent to Hydro's Application, Newfoundland Power's 2022–2023 General Rate Application settlement agreement included a change to the recovery period of CDM program costs from seven to ten years commencing January 1, 2021.¹⁷ The ten-year amortization period was approved in Board Order No. P.U 3(2022).¹⁸ In its response to CA-NLH-021, Hydro noted that "[s]hould Newfoundland Power's proposal to increase the amortization period be approved, Hydro anticipates seeking alignment."¹⁹ Given Newfoundland Power has moved to a ten-year amortization period, Hydro will apply for a revised ECDM Cost Deferral Account definition to align the amortization period between the Utilities.

1.5 Demand Response Programming

The 2021 Plan includes load management initiatives, such as the Residential EV & Charging Infrastructure Program that will incent the purchase and installation of smart Level 2 EV chargers capable of demand response, combined with a Demand Response Pilot Program. This program is critical to encourage EV charging behaviour during off-peak hours as contemplated in the 2021 Plan, as electrification that occurs during system peak has the potential to increase system costs.

Approval of the Utilities' applications, combined with the timely implementation of the Residential EV & Charging Infrastructure Program, will mitigate the risk of increased system costs due to unmanaged EV charging.

2.0 CONSUMER ADVOCATE'S SUBMISSION

The Consumer Advocate's submission identifies various changes in the vehicle market since the filing of the 2021 Plan, including forecast price parity between EVs and gasoline-powered vehicles as well as oil prices. As noted previously, the Utilities have not applied for approval of specific electrification programming for this very reason, so program offerings can be quickly adapted to changing market conditions to ensure they remain cost-effective. As noted in the Utilities' joint update on market conditions:

All electrification initiatives will be evaluated for participation levels and cost effectiveness on an annual basis. Formal evaluations will be conducted by a third party following the first year of operation and biannually during operation. Similar to the utilities' CDM programs, changes to program design and delivery, including incentive amounts, will occur as required.²⁰

Hydro agrees that the market has changed since the filing of the 2021 Plan; however, these changes have not materially affected the business case for proceeding with electrification and, in fact, serve to support the approach proposed by the Utilities.

¹⁷ "Settlement Agreement for the Proposed Resolution of Issues Arising from the Application," November 22, 2021, p. 3, para 16.

¹⁸ *Public Utilities Act*, RSNL 1990, c P-47, Board Order No. P.U. 3(2022), Board of Commissioners of Public Utilities, February 16, 2022.

¹⁹ Please refer to Hydro response to CA-NLH-021 p. 1/19–21, of this proceeding.

²⁰ "Newfoundland and Labrador Hydro – Application for Approvals Required to Execute Programming Identified in the Electrification, Conservation and Demand Management Plan 2021-2025; and Newfoundland Power Inc. - 2021 Electrification, Conservation and Demand Management Application – Response to Request for Market Conditions Update," Newfoundland and Labrador Hydro and Newfoundland Power Inc., June 17, 2022, p 3.

The Consumer Advocate also highlights a recent commitment by the City of St. John's to install 26 Level 2 EV charging stations (typically capable of 7 kW). Such investments will serve to support electrification and the outcomes of the 2021 Plan; however, they will not displace the need for DCFCs (60 kW+) for long-distance travel, as proposed by the Utilities.

The 2021 Plan is forecast to provide long-term rate mitigating benefits for customers while introducing minimal bill impacts in the short term;²¹ in this regard, Hydro's Application is consistent with its obligation for least-cost, reliable service in accordance with the *EPCA*. Hydro continues to work with GE Canada ("GE") on revised software for the Labrador-Island Link ("LIL") and GE anticipates that Factory Acceptance Testing will start in the coming weeks. Hydro submits that approval of its application will promote long-term rate mitigating benefits for customers, allow for load management as the number of EVs continues to grow in the province, and therefore should not be impacted by the in-service date of the LIL.

3.0 ISLAND INDUSTRIAL CUSTOMER GROUP

3.1 Pre-Filed Evidence of Patrick Bowman

On May 4, 2022, the Island Industrial Customer Group filed expert evidence of Mr. Patrick Bowman.²² Mr. Bowman's evidence recommends that the mTRC be used to assess electrification programming; however, his position is that it be used as a secondary test with utility and non-participant tests being primary. Further, Mr. Bowman recommends that the Board direct the Utilities to only undertake programs that achieve positive non-participant outcomes within five years at the longest.²³ Hydro notes that this recommended time horizon is based upon Mr. Bowman's judgment that rate mitigation is a top priority of policy objectives for this jurisdiction; however, in response to an RFI from Hydro Mr. Bowman acknowledged that he has no specific knowledge of the Government of Newfoundland and Labrador's policy priorities.²⁴ Mr. Bowman did not provide any evidence or support that the recommended timeline of five years was consistent with generally accepted public utility practice, as required by the Section 4 of the *EPCA*.²⁵

Regardless, Mr. Bowman agreed that, assuming the forecast outcomes were accurate, the 2021 Plan was worth pursuing, albeit with some concerns to be addressed:

In short, when the NP metrics are combined with Hydro's, the program has a passable profile – limited negative impact for about the first 3-4 years, turning positive by about year 5-6, and starting to grow to a material level by about year 8-10. As an electrification program with additional other benefits (e.g., customer gas cost savings and emissions benefits), such a program may be worth pursuing.²⁶

²¹ The combined net present value of the Utilities is forecast to be approximately \$98 million over the 15-year time horizon, as noted in Hydro's response to TC-PUB-NLH-004 and Newfoundland Power's response to TC-PUB-NP-005, of this proceeding. The largest negative impact for customers is forecast to be an average annual bill increase of \$4 in 2024, as noted in Newfoundland Power's response to PUB-NP-066, of this proceeding.

²² "Electrification, Conservation and Demand Management Plan Review, including Use of a Modified Total Resource Cost Test – Pre-filed Testimony of Patrick Bowman," InterGroup Consultants, May 4, 2022.

²³ "Electrification, Conservation and Demand Management Plan Review, including Use of a Modified Total Resource Cost Test – Pre-filed Testimony of Patrick Bowman," InterGroup Consultants, May 4, 2022, p. 2/14–25.

²⁴ "Electrification, Conservation and Demand Management Plan Review, including Use of a Modified Total Resource Cost Test – Pre-filed Testimony of Patrick Bowman," InterGroup Consultants, May 4, 2022, p. 2/18–19 states, "This is consistent with the policy imperative that rate mitigation is a top priority." However, the Island Industrial Customer Group's response to NLH-IIC-006 of this proceeding states, "Mr. Bowman has no specific knowledge of the Government of Newfoundland and Labrador's policy priorities, in terms of relative importance of various Government imperatives."

²⁵ Please refer to part (a) of the Island Industrial Customer Group's response to NLH-IIC-004, of this proceeding.

²⁶ Please refer to the Island Industrial Customer Group's response to NLH-IC-002, p. 2/1–5, of this proceeding.

3.2 Island Industrial Customer Group's Submission

The Island Industrial Customer Group submits that the Utilities should use the following approach for the evaluation of electrification programming:

- Program Administrator Cost Test ("PAC" or "PACT") and NPV (i.e., non-participant tests);
- mTRC (i.e., a participant test); and
- Rate Impact Measure ("RIM") and NPV (i.e., rate impact assessments).

In Hydro's view, this approach is not consistent with generally accepted public utility practice and is inconsistent with the National Standard Practice Manual.

3.2.1 mTRC and Generally Accepted Public Utility Practice

As documented throughout the filings in this proceeding, there is more than adequate support within the utility industry for the use of the evaluation methods proposed by Hydro. Hydro's proposed evaluation approach is in line with industry practice and national standards.

Hydro's evidence identifies the other jurisdictions that use overall cost assessments such as the mTRC in evaluating electrification programming, as well as Hydro's use of an NPV analysis.²⁷ This combined approach ensures that: (i) electrification programs are sufficiently economic to enable customer participation, and (ii) customer participation in electrification programs will provide a rate-mitigating benefit to customers over the long term.

The benefits of this combined approach, and its consistency with the National Standard Practice Manual, were outlined by the Utilities.²⁸ A third-party consultant's survey of current utility practice confirmed that the mTRC is consistent with the approach of other utilities in conducting overall cost assessments of electrification programs.²⁹ The Utilities received letters of support from the Government of Newfoundland and Labrador, which indicate the 2021 Plan's alignment with this jurisdiction's policy objectives.³⁰

Finally, Hydro's response to PUB-NLH-029 of this proceeding provided further justification for the approval of the mTRC test in conjunction with an NPV analysis in the context of Hydro's Application. It is important to recognize that the benefits of electrification take time to accrue and Hydro is proposing an amortization of the ECDM costs to minimize intergenerational equity concerns for existing customers.

Hydro believes that the evidence before the Board justifies the use of the mTRC supported by an NPV analysis for evaluation of electrification programming to ensure benefits accrue to customers on the Island Interconnected System over the long term. Hydro submits that its proposed approach is consistent with generally accepted utility practice³¹ and that it should be approved without modification.

²⁷ Please refer to Hydro's response to PUB-NLH-021, of this proceeding.

²⁸ Please refer to Hydro's responses to PUB-NLH-022 and PUB-NLH-023, of this proceeding.

²⁹ Please refer to Hydro's response to PUB-NLH-024, of this proceeding.

³⁰ Please refer to Attachment 1 of Hydro's response to TC-PUB-NLH-002, of this proceeding.

³¹ Please refer to Hydro's response to PUB-NLH-021, of this proceeding.

3.2.2 PAC and RIM for Electrification

The Island Industrial Customer Group also recommends the use of both PAC and RIM in the evaluation of electrification programming.

As noted in the National Standard Practice Manual, most jurisdictions that have adopted the PACT test to evaluate cost-effectiveness have done so “. . . primarily for [energy efficiency] resources.”^{32,33} The California Standard Practice Manual³⁴ notes that the PACT “. . . cannot be used to evaluate load building programs.”³⁵ This view was shared by ICF, the consultant responsible for Hydro’s electrification model, which confirmed that the PAC is typically used in energy conservation programs and further confirmed that no other utility clients or regulators have asked for the use of PAC to evaluate load-building programs.³⁶

With respect to the application of a RIM test in addition to an NPV analysis, the submission of the Island Industrial Customer Group states, “Only if . . . [the RIM test] raises serious and uncorrectable fairness and distributional effects would it be used to screen out a program.”³⁷ In Hydro’s view, such a circumstance is already addressed by the proposed approach, which includes an NPV analysis. Further, as noted in the National Standard Practice Manual, there are a number of limitations with respect to interpretation of RIM Test results including that the “[a]pplication of the RIM Test can lead to perverse outcomes”³⁸ and “. . . RIM Test results can be misleading.”³⁹ Table I-2 in the 2021 Plan⁴⁰ indicates that a minority of jurisdictions use the RIM test to evaluate electrification programming.

In Hydro’s view, the application of the PAC and RIM Tests as proposed by the Island Industrial Customer Group is duplicative, given Hydro’s proposed approach may produce misleading results, and is not consistent with generally accepted public utility practice.

4.0 CONCLUSION

Hydro’s Application seeks approval of the use of an mTRC test (supported by an NPV analysis) in the evaluation of electrification programming, and updated deferral account definitions that will permit the deferral of electrification programming costs, Labrador Interconnected CDM costs, and DCFC capital and operating costs.

³² “National Standard Practice Manual For Benefit-Cost Analysis of Distributed Energy Resources,” August 2020, p. 3-2. <<http://ceeep.rutgers.edu/wp-content/uploads/2013/11/SPM2001.pdf>>

³³ In addition to the PACT test (referred to in the “National Standard Practice Manual For Benefit-Cost Analysis of Distributed Energy Resources,” August 2020 as the Utility Cost Test), other common cost-effectiveness tests for energy-efficiency programs include the Societal Cost Test and the Total Resource Cost Test.

³⁴ As noted in the “National Standard Practice Manual For Benefit-Cost Analysis of Distributed Energy Resources,” August 2020, traditional screening tests such as the PACT have been used in the California Standard Practice Manual: Economic Analysis of Demand-Side Programs and Projects” for several decades to assess cost-effectiveness.

³⁵ “California Standard Practice Manual: Economic Analysis of Demand-Side Programs and Projects,” October 2001, p.24. <<http://ceeep.rutgers.edu/wp-content/uploads/2013/11/SPM2001.pdf>>

³⁶ “Application for Approvals Required to Execute Programming Identified in the Electrification, Conservation and Demand Management Plan 2021–2025,” Newfoundland and Labrador Hydro, September 10, 2021.

³⁷ “Newfoundland and Labrador Hydro – Approvals Required to Execute Programming Identified in the Electrification, Conservation and Demand Management Plan 2021-2025 Application; and Newfoundland Power Inc. – 2021 Electrification, Conservation and Demand Management Application,” Island Industrial Customer Group, July 5, 2022, p. 4.

³⁸ “National Standard Practice Manual For Benefit-Cost Analysis of Distributed Energy Resources,” August 2020, p. A-4. <<http://ceeep.rutgers.edu/wp-content/uploads/2013/11/SPM2001.pdf>>

³⁹ “National Standard Practice Manual For Benefit-Cost Analysis of Distributed Energy Resources,” August 2020, p. A-4. <<http://ceeep.rutgers.edu/wp-content/uploads/2013/11/SPM2001.pdf>>

⁴⁰ “Application for Approvals Required to Execute Programming Identified in the Electrification, Conservation and Demand Management Plan 2021–2025,” Newfoundland and Labrador Hydro, rev. July 8, 2021 (originally filed June 16, 2021), sch 3, sch I, p. 3.

The information provided by Hydro throughout this proceeding, and summarized above, illustrates that Hydro's Application is consistent with generally accepted public utility practice, as required by Section 4 of the *EPCA*. If approved, the establishment of the 2021 Plan will result in rate-mitigating benefits for customers over the long term and is therefore consistent with Hydro's obligation for least-cost, reliable service in accordance with the *EPCA*. Approval of Hydro's Application will permit planned customer load management programs to be established, which will serve to mitigate increased system costs from electrification during system peak.

Given the foregoing, Hydro respectfully requests that its application be approved as filed.

Should you have any questions, please contact the undersigned.

Yours truly,

NEWFOUNDLAND AND LABRADOR HYDRO



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