

The draft schedule's very tight timelines were based on a December 30, 2011 date for the Board to file its report.

As Consumer Advocate, I would suggest that these time intervals are simply too tight given the complexity of the matter and its importance. We have seen the difficulty with the RFI process thus far. RFIs take time to prepare and they also take time to answer. Then they take time to review and digest. For our consultants and ourselves to be in the position of asking RFIs within a week of MHI's filing and to be filing our evidence about a week after the replies poses a substantial challenge. For one thing, the time is too short and, for another, it is quite often the case that a follow-up round of RFIs are necessary in order for us and our experts to get to the answers we would require before filing a technical report.

Also to be kept in mind when looking at the time intervals is the fact that the Consumer Advocate and its consultants have not been made privy to the confidential filings made with the Board. It may turn out that in fact a lot of which is now labelled "confidential" may not be in fact subject to a claim of confidentiality once Nalcor screens it all. But the fact remains that once that screening takes place that information still has to be reviewed and assessed by us and our consultants and questions will undoubtedly flow from it in the RFI process. The as yet unforeseen information will undoubtedly be voluminous. *At this stage, Hydro has not indicated when they would be able to have the material screened and the appropriate material released to me for our review. My understanding is that this screening process has been held up while Nalcor directs attention to the RFI process.*

Finally, as Consumer Advocate I would be planning to have several public sessions around the Province so that I may receive public input on the matters engaged in this reference, as part of my own consultation process for this review. We had been anticipating undertaking that step prior to the Board's public consultation phase.

These are considerations which I believe should be taken into account as regards scheduling. I would be happy to discuss these with you further.

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