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July 24, 2025

VIA EMAIL

New Brunswick Energy and Utilities Board
P.O. Box 5001
Suite 800, Brunswick House
44 Chipman Hill
Saint John, NB E2L 4Y9
Attention: Ms. Melissa Curran, Chief Clerk

**Re: Renewables Integration and Grid Security ("RIGS") Project
Matter No. EL-002-2025**

Dear Ms. Curran:

In relation to the above noted Matter, please find attached:

1. NB Power's Application, in both French and English, dated July 23, 2025;
2. Notice of Motion, dated July 23, 2025;
3. CONF Affidavit of Justin Urquhart July 23 2025 CONFIDENTIAL
4. Affidavit of Justin Urquhart July 23, 2025 REDACTED; and
5. Claim for Confidentiality.

In accordance with the Claim for Confidentiality, NB Power is providing the Confidential version of the affidavit to the Board, Board counsel and staff, and the Public Intervener. NB Power will, by separate email, serve this letter and all documents other than the confidential version of the affidavit on all parties to the last two General Rate Applications, being Matter 552 and Matter 541.

The Board will note that NB Power files this Application in advance of the filing of its supporting evidence, and seeks directions from the Board both on the hearing of the Notice of Motion, and the hearing of the Application itself, should that be necessary.

NB Power requests that the Board schedule a Pre-Hearing Conference to approve a hearing schedule for the Application, and schedule a Motion's Day for the hearing of the Motion, at the earliest opportunity. This request is due to the need for the capacity of this facility by 2028, and the timelines necessary to meet that deadline.

As noted in the Notice of Motion, the Targeted Commercial Operation Date ("COD") for this Generation Facility is August 1, 2028. However, the obligation of the Owner of the facility to achieve the COD is subject to a number of conditions precedent, including the requirement that NB Power obtain either a determination that section 107 of the *Electricity Act* does not apply to the Project, or the Board's approval of the Project under subsection 107(9) of the *Act*. An early determination of the issues raised in the Application and Notice of Motion facilitates achievement of the Targeted COD.

I trust this is satisfactory. Please do not hesitate to contact me if the Board requires further information.

Regards,

A handwritten signature in blue ink, appearing to read "John G. Furey". The signature is stylized with a large initial "J" and a long, sweeping underline.

John G. Furey