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Our File Reference: 111388

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*PLEASE REPLY TO EDMONTON
OFFICE*

February 21, 2017

Mackenzie Valley Land and Water Board
7th Floor, 4922- 48 Street
Yellowknife, NT
X1A 2P6

VIA e-mail

Attention: Shannon Allerston, Regulatory Officer

Dear Madame:

**RE: Board File MV2011L4-0002; Northwest Territories Power Corporation
("NTPC") Water License re: Taltson Operations
Compensation Re-Hearing Expert Report Submission and Extension
Request**

Further to your letter dated February 20, 2017, we herein provide NTPC's response to the extension request filed by Counsel to the Carter Family. As noted in your letter, the Carter Family filed its expert reports on February 17th, whereas the Workplan issued by the Board set a deadline of January 27th for the Carter Family to make this filing.

In its letter dated February 17th, Counsel to the Carter Family explained the need for the requested extension. NTPC notes those reasons, however respectfully does not find them to be persuasive under the circumstances to justify the delay.

More particularly, NTPC has understood based on representations made by Counsel on a number of previous occasions, indeed dating back for at least a year, that the Carter Family experts have been in a position to prepare and file their reports in a timely fashion. Moreover, the Judicial Review Decision underpinning this Proceeding was issued almost 3 years ago, on March 7, 2014.

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As such, it comes as a surprise to NTPC that delays in finalizing reports, and questions concerning the “appropriate scope of evidence”, would only arise on the eve of a filing deadline.

Notwithstanding these concerns, NTPC will not seek any remedy from the Board in relation to the late filing or the requested extension.

However, NTPC advises the Board that the updated Workplan should be revised so as not to prejudice or adversely affect NTPC’s rights to prepare and file materials in due course, as it may choose to do so or as may be provided for in the previous Workplan.

Further, NTPC and its advisors have not yet reviewed the filed materials from the Carter Family, and therefore NTPC reserves its rights to seek remedies from the Board as may be appropriate.

Please contact the undersigned if you have any questions.

Yours truly,

A handwritten signature in black ink, appearing to read "D. Evanchuk", with a long horizontal flourish extending to the right.

DOUGLAS I. EVANCHUK

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