



July 24, 2014

Ms. G. Cheryl Blundon
Board of Commissioners of Public Utilities
120 Torbay Road, P.O. Box 12040
St. John's, NL A1A 5B2

Dear Ms. Blundon:

Re: Facility Association Application of March 6, 2014

In relation to the above noted application and further to the Notice of Hearing issued by the Newfoundland and Labrador Board of Commissioners of Public Utilities on July 7, 2014, we enclose the original and twelve (12) copies of the Intervenor's Submission of the Consumer Advocate.

We trust the foregoing is found to be in order.

Yours very truly,

O'DEA, EARLE

A handwritten signature in blue ink, appearing to read 'Thomas Johnson', is written over the typed name.

THOMAS JOHNSON
TJ/cel
encl.

IN THE MATTER OF an Application dated March 6, 2014 by Facility Association to the Newfoundland and Labrador Board of Commissioners of Public Utilities seeking approval of increased rates for Third Party Liability, Accident Benefits and Uninsured Automobile coverage for its Taxi and Limousine class of business (the "Application").

TO: The Board of Commissioners of Public Utilities (the "Board")

INTERVENOR'S SUBMISSION

General

1. The Consumer Advocate wishes to intervene in the Application.

Interests of the Consumer Advocate

2. The Consumer Advocate has been appointed to represent the interests of automobile insurance customers in relation to the Application and therefore has an interest in the proposals contained in the Application.

Disposition Advocated by the Consumer Advocate

3. It would be premature for the Consumer Advocate to advocate a particular disposition of the Application at this time as the Consumer Advocate's review of the Application is continuing at this time.

Facts and Reasons Supporting Intervention

4. The reason for the Consumer Advocate's intervention is to receive and consider materials filed in support of the Application so as to be in a position to assess whether Facility Association's proposed Application proposes rates that are in excess of that which is required or justified pursuant to this Automobile Insurance

Regulations (NLR 81/04).

Participation of the Consumer Advocate

5. In light of the Consumer Advocate's ongoing review of the Application, the Consumer Advocate cannot state at this time whether or not he shall present evidence in relation to the Application. The Consumer Advocate may wish to participate in technical conferences, file requests for information and to avail of the right to cross-examine witnesses or to submit argument at a public hearing of the Application, all as the circumstances may require.

DATED at St. John's, in the Province of Newfoundland and Labrador, this 24th day of July, 2014.



THE CONSUMER ADVOCATE

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