



October 24, 2022

Board of Commissioners of Public Utilities  
P.O Box 21040  
120 Torbay Road  
St. John's, NL A1A 5B2

BY EMAIL

Attention: G. Cheryl Blunden  
Director of Corporate Services  
and Board Secretary  
Email: [ito@pub.nl.ca](mailto:ito@pub.nl.ca)

Dear Ms. Blundon:

**Re: Newfoundland and Labrador Hydro - Application for a Non-Firm Rate for Labrador**

Further to the extension granted by the Board to Enovum to submit this intervenor submission as per your email of October 20, 2022, please find enclosed Enovum's Intervenor Submission in relation to the above-noted Application.

If you have any questions, please contact Enovum's legal counsel, Ali Amadee at Dentons Canada LLP at [ali.amadee@dentons.com](mailto:ali.amadee@dentons.com) or by phone at (514) 878-8876.

Regards,

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Bahador Zabihyan  
Director of Public Affairs  
Enovum Corp.  
[bzabihyan@enovumdc.com](mailto:bzabihyan@enovumdc.com)  
3195 Chem. Bedford Suite D, Montreal, Quebec H3S 1G3

Cc: Ali Amadee, Dentons

**IN THE MATTER OF** the *Electrical Power Control Act*, 1994, SNL 1994, Chapter E-5.1 (“EPCA”) and the *Public Utilities Act*, RSNL 1990, Chapter P-47 (“Act”), and regulations thereunder; and

**IN THE MATTER OF** an application by Newfoundland and Labrador Hydro (“Hydro”) pursuant to Section 70 of the Act for approval of a rate for Non-Firm Service in Labrador, and other associated matters (“Application”).

**TO:** The Newfoundland and Labrador Board of Commissioners of Public Utilities (the “Board”)

### **INTERVENOR SUBMISSION OF ENOVUM CORP.**

#### **A. General**

- (1) Enovum Corp. (“Enovum”) is a corporation incorporated and existing under the laws of Canada. Enovum wishes to participate in the Application as an intervenor.

#### **B. Interest of Enovum**

- (2) Enovum is proposing to develop a site to be connected with the Labrador Interconnected System. Enovum Corp. wishes to avail itself of the Non-Firm Rate Option, as per its ongoing discussions with Hydro. As such, Enovum has an interest in the ongoing Application, including, *inter alia*, as regards its outcome as it relates to the Non-Firm Rate, of which Enovum wishes to avail itself.

#### **C. Disposition Advocated by Enovum**

- (3) Enovum will not be in a position to advocate a specific disposition of the Application until such time as Enovum has had an opportunity to have a satisfactory understanding of the matters to be considered in the Application.

#### **D. Facts and Reasons Supporting Intervention**

- (4) Enovum intends to cite appropriate facts and reasons supporting our position after reviewing the evidence disclosed during the Application and having a satisfactory understanding of the matters to be

considered in the Application. Any requests regarding qualification of expert witnesses, if any, and list of information and support documents in support of our representations, if necessary, would also be cited after such review and satisfactory understanding.

**E. Participation of Enovum**

- (5) Enovum proposes to participate in the hearing of the Application and the various procedures associated with the Application including, without limitation:
- (a) directing requests for information to Hydro as may be permitted by the Board;
  - (b) participating in technical conferences or similar processes mandated by the Board;
  - (c) submitting evidence, including expert evidence, as necessary;
  - (d) making representations to the Board concerning the Application;
  - (e) cross-examining witnesses as may be appropriate in the circumstances; and
  - (f) participation in other processes as the Board may mandate or allow or circumstances may require.

**F. Documents Relating to the Application**

Documents relating to this Application may be served on Enovum in care of its legal counsel at:

Ali Amadee  
Dentons Canada LLP  
1 Place Ville Marie, Suite 3900 Montréal, Québec H3B 4M7 Canada  
Tel : D +1 514 878 8876  
Email: [ali.amadee@dentons.com](mailto:ali.amadee@dentons.com)

**DATED** at Montreal, Quebec this 24th day of October, 2022.

**ENOVUM CORP.**

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Bahador Zabihyan, Director of Public Affairs, Enovum  
3195 Chem. Bedford Suite D, Montreal, Quebec H3S 1G3