

WHENEVER. WHEREVER.
We'll be there.



October 19, 2022

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

Attention: G. Cheryl Blundon
Director of Corporate Services
and Board Secretary

Dear Ms. Blundon:

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

Please find enclosed Newfoundland Power's Intervenor Submission in relation to the above-noted Application.

If you have any questions regarding the enclosed, please contact the undersigned at your convenience.

Yours truly,

A handwritten signature in blue ink that reads "Dominic Foley". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Dominic Foley
Legal Counsel

ec. Shirley Walsh
Newfoundland & Labrador Hydro

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Newfoundland Power Inc.

55 Kenmount Road • P.O. Box 8910 • St. John's, NL A1B 3P6

PHONE (709) 693-3206 • FAX (709) 737-2974 • dfoley@newfoundlandpower.com

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 NEWFOUNDLAND POWER INC.

A. General

1. Newfoundland Power Inc. (“Newfoundland Power”) is a body corporate, organized and existing pursuant to the laws of Newfoundland and Labrador and is a public utility within the meaning of the Act and the EPCA.
2. Newfoundland Power wishes to participate in the Application.

B. Interest of Newfoundland Power

3. Newfoundland Power purchases approximately 93% of its electricity requirements from Hydro. As Hydro’s largest customer, Newfoundland Power’s interest in the Application includes, without limitation, an interest in ensuring that the rates to be charged for electricity to all of Hydro’s customers are just and reasonable.

C. Disposition Advocated by Newfoundland Power

4. Until Newfoundland Power has had an opportunity to gain a satisfactory understanding of the matters to be considered in the application, Newfoundland Power will not be in a position to advocate a specific disposition of the Application.

D. Facts and Reasons Supporting Intervention

5. The primary reason for Newfoundland Power’s intervention is to receive and consider materials filed in support of the Application so as to be in a position to assess whether the record before the Board indicates that Hydro’s proposals are just and reasonable.

E. Participation of Newfoundland Power

6. Newfoundland Power proposes to fully 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 and making representations to the Board concerning the disposition of the Application;
 - d) cross-examining witnesses as may be appropriate in the circumstances; and
 - e) participation in other processes as the Board may mandate or allow or circumstances may require.

DATED at St. John's, Newfoundland and Labrador this 19th day of October, 2022.

NEWFOUNDLAND POWER INC.



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