

June 22, 2021

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

Attention: Ms. Cheryl Blundon
Director of Corporate Services & Board Secretary

Dear Ms. Blundon:

Re: Newfoundland Power's 2022–2023 General Rate Application

Please find attached Newfoundland and Labrador Hydro's Intervenor Submission in relation to the above noted application.

Should you have any questions, please contact the undersigned.

Yours truly,

NEWFOUNDLAND AND LABRADOR HYDRO



Shirley A. Walsh
Senior Legal Counsel, Regulatory
SAW/sk

ecc: **Board of Commissioners of Public Utilities**
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Newfoundland Power

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Sarah G. Fitzgerald, Browne Fitzgerald Morgan & Avis
Bernice Bailey, Browne Fitzgerald Morgan & Avis

IN THE MATTER OF the
Public Utilities Act, (R.S.N.L. 1990, Chapter P-47)
("Act"), and regulations thereunder;

AND IN THE MATTER OF a general rate
application ("Application") by
Newfoundland Power Inc.
("Newfoundland Power") to establish
customer electricity rates for 2022 and 2023

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

Intervenor's Submission of Newfoundland and Labrador Hydro ("Hydro")

1. Hydro is a corporation continued and existing under the *Hydro Corporation Act, 2007*, is a public utility within the meaning of the *Act* and is subject to the provisions of the *Electrical Power Control Act, 1994*.

Hydro's Interest in the Matter

2. The Applicant, Newfoundland Power, is the primary electrical distribution utility on the island of Newfoundland, and is Hydro's largest customer. The energy that Newfoundland Power purchases from Hydro constitutes approximately 85% of the energy that is generated or purchased and transmitted by Hydro for consumption within the Province of Newfoundland and Labrador. Hydro is a customer of Newfoundland Power at several of its locations throughout the Island of Newfoundland including Hydro's head office in St. John's.
3. All of Hydro's Rural Customers served from the Island Interconnected Grid, and its customers in the Labrador Straits area, pay the same rates as those approved by the Board for Newfoundland Power's customers. As well, Hydro's non-government customers served from its isolated diesel systems are charged the same rates for their "lifeline" consumption as those charged by Newfoundland Power.
4. It is reasonable to expect that regulatory decisions and principles that are developed and applied to Newfoundland Power will be applicable to Hydro.

Disposition Advocated by Hydro

5. As of the date of this submission, Hydro is in the process of reviewing and analyzing the Application; as such, it would be premature for Hydro to advocate a particular disposition. Until Hydro has had an opportunity to gain a satisfactory understanding of the matters to be considered in the Application, Hydro will not be in a position to advocate a specific disposition.
6. Further, until Hydro has had an opportunity to gain a satisfactory understanding of the matters to be considered in the Application, it would be premature for Hydro to submit details of any facts it intends to show in evidence or the reasons for which the Board should dispose of the Application of Newfoundland Power in a particular manner.

Hydro's Participation in the Hearing

7. Hydro is requesting Intervenor status for the purposes of obtaining all information filed in the proceeding. Hydro's participation may include, but not be limited to, any or all of the following activities:
 - (i) Directing information requests to Newfoundland Power;
 - (ii) Cross-examining witnesses appearing on behalf of Newfoundland Power or any other party;
 - (iii) Calling witnesses, including expert witnesses, as is appropriate in the circumstances; and
 - (iv) Making representations to the Board concerning the Application and/or the disposition thereof.

DATED at St. John's in the Province of Newfoundland and Labrador this 22nd day of June, 2021.

NEWFOUNDLAND AND LABRADOR HYDRO

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