

In The Matter of the Public Utilities Act, R.S.N. 1990, Chapter P-47 (the "Act"); and

In The Matter of a General Rate Application (the "Application") by Newfoundland and Labrador Hydro dated July 30, 2013

**To: The Board of Commissioners of Public Utilities (the "Board")**

## **INTERVENOR'S SUBMISSION OF THE CONSUMER ADVOCATE**

### Interest of the Consumer Advocate

1. By Order-in-Council made pursuant to Section 117 of the Public Utilities Act, R.S.N. 1990, c. P-47, Thomas Johnson was appointed as Consumer Advocate to represent the interests of domestic and general service consumers for the purpose of hearings of the Public Utilities Board into Newfoundland and Labrador Hydro's General Rate Application. All customers of Newfoundland and Labrador Hydro as well as customers of Newfoundland Power Inc. may be affected by the outcome of this Application as all aspects of Newfoundland and Labrador Hydro's regulated activities are subject to review.
  
2. The Consumer Advocate's interest in the Application includes, without limitation, an interest in ensuring that rates to be charged for electricity are just and reasonable in accordance with the Act, Electrical Power Control Act, 1994, the Hydro

Corporation Act and all regulations made thereto.

Disposition Advocated by the Consumer Advocate

3. In light of the recent filing of the Application and the matters and questions still remaining to be addressed in the Request for Information process and hearing process, it would be premature to advocate a particular disposition to the various issues raised in the Application.

Facts and Reasons Supporting Intervention

4. As stated above in paragraph 3 hereof, it would be premature for the Consumer Advocate to decide what facts it intends to show in evidence or for what reasons the Board should dispose of the Application of Newfoundland and Labrador Hydro in a particular manner.

Participation of the Consumer Advocate

5. The Consumer Advocate proposes to fully participate in the hearing of the Application filed by Newfoundland and Labrador Hydro, including, without limitation:
  - (a) directing information requests to Newfoundland and Labrador Hydro;
  - (b) participating in technical conferences or similar processes mandated by the Board;

- (c) cross-examining of witnesses appearing on behalf of Newfoundland and Labrador Hydro or any other party;
- (d) calling of witnesses, including expert witnesses, as is appropriate in the circumstances;
- (e) making representations to the Board concerning the disposition of the Application.

**DATED AT** St. John's, Newfoundland and Labrador, this 27<sup>th</sup> day of August, 2013.



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Ms. Sheryl Nisenbaum, Assistant Secretary  
Praxair Canada Inc.