

August 20, 2015

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

Ladies & Gentlemen:

**Re: Newfoundland and Labrador Hydro – 2016 Capital Budget Application**

In relation to the above noted application please find enclosed the original and twelve (12) copies of the Consumer Advocate's Intervenor's Submission.

A copy of the letter, together with the enclosure, has been forwarded directly to the parties listed below.

If you have any questions regarding the enclosed, please do not hesitate to contact the undersigned.

Yours very truly,

O'DEA, EARLE



THOMAS JOHNSON, Q.C.  
TJ/cel  
Encl.

cc: Newfoundland Power  
Attention: Mr. Gerard Hayes

Newfoundland and Labrador Hydro  
Attention: Mr. Geoffrey Young

Island Industrial Customers  
Attention: Paul Coxworthy

Vale Newfoundland & Labrador Limited  
Attention: Tom O'Reilly, Q.C.

**IN THE MATTER OF** the *Public Utilities Act*, (the "*Act*"); and

**IN THE MATTER OF** an Application by Newfoundland and Labrador Hydro for an Order approving: (1) its 2016 capital budget pursuant to s. 41(1) of the *Act*; (2) its 2016 capital purchases, and construction projects in excess of \$50,000 pursuant to s. 41(3)(a) of the *Act*; (3) its leases in excess of \$5,000 pursuant to s. 41(3)(b) of the *Act*; and (4) its estimated contributions in aid of construction for 2016 pursuant to s. 41(5) of the *Act*.

**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 represents the interests of domestic and general electricity customers of both utilities operating in the Province and therefore has an interest in Newfoundland and Labrador Hydro's proposed capital expenditures for 2016.

### **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.

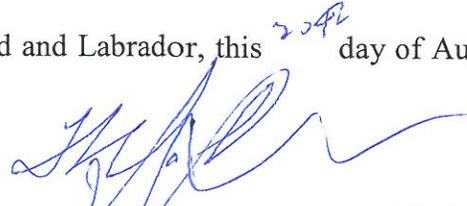
### **Facts and Reasons Supporting Intervention**

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 the record before the Board indicates that Newfoundland and Labrador Hydro's proposed capital expenditures for 2016 are reasonably necessary for Hydro to meet its obligations to provide electrical service as required by the *Act*.

## 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 <sup>20<sup>th</sup></sup> day of August, 2015.



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**THE CONSUMER ADVOCATE**

Thomas J. Johnson, Q.C.  
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