

August 30, 2013

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Via Electronic Mail and Courier

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



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

Dear Ms. Blundon:

Re: Newfoundland and Labrador Hydro's 2013 General Rate Application

Please find enclosed the original and twelve (12) copies of the Intervenor's Submission of the Island Industrial Customers in the above Application.

We trust you will find the enclosed to be in order.

Yours truly,

Stewart McKelvey

Paul L. Coxworthy

PLC/kmcd

- c. Mr. Geoffrey P. Young, Senior Legal Counsel, Newfoundland and Labrador Hydro
- Mr. Thomas J. Johnson, Consumer Advocate
- Mr. Gerard Hayes, Newfoundland Power
- Mr. Dean A. Porter, Poole Althouse
- Mr. Thomas O'Reilly, Q.C., Vale Newfoundland and Labrador Limited
- Mr. Edward M. Hearn, Q.C., Miller & Hearn

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DIRECTOR-BOARD SECRETARY	✓ OFFICER ✓
DIRECTOR-REGULATORY	OTHERS ✓
RA	MM ✓ HC ✓ STEA ✓ SBL ✓ MGL ✓

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

IN THE MATTER OF a General Rate Application (the Application) by Newfoundland and Labrador Hydro for approvals of, under Section 70 of the Act, changes in the rates to be charged for the supply of power and energy to Newfoundland Power, Rural Customers and Industrial Customers; and under Section 71 of the Act, changes in the Rules and Regulations applicable to the supply of electricity to Rural Customers.

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

INTERVENOR'S SUBMISSION

TAKE NOTICE that **Corner Brook Pulp and Paper Limited, North Atlantic Refining Limited and Teck Resources Limited (the "Island Industrial Customers Group")**, through their solicitors Stewart McKelvey and Poole Althouse, hereby give notice of their intention to participate in the within Application, in their respective positions as Island Industrial Customers of the Applicant Newfoundland and Labrador Hydro (the "Applicant") which are affected by the rates charged by the Applicant.

Interest of the Island Industrial Customers Group

1. Each of the Island Industrial Customers Group, presently own and operate on the Island of Newfoundland substantial industrial operations, each of which is a major consumer of power purchased from the Applicant.

Dispositions Sought by the Island Industrial Customers Group

2. Given the very recent filing of the Application, and the various matters raised by the Application and to be addressed by Requests for Information and by other pre-

hearing and hearing processes, the Island Industrial Customers Group do not yet have sufficient information, and have not yet had sufficient opportunity, to formulate particular dispositions with respect to the various approvals sought by the Applicant.

Facts and Reasons Supporting Intervention

3. The Island Industrial Customers Group repeat the foregoing paragraph and state that there has not yet been sufficient opportunity for the Island Industrial Customers Group to submit what facts they intend to show in evidence or for what reasons the Board should dispose of the various approvals sought by the Application in a particular manner.

Participation of the Island Industrial Customers Group

4. The Island Industrial Customers Group intend to participate in the various procedures associated with the Application including without limitation:
 - a) directing Requests for Information and other information requests to the Applicant as may be permitted by the Board;
 - b) participating in technical conferences, pre-hearing conferences, and other processes associated with the Application;
 - c) cross-examination of witnesses appearing on behalf of the Applicant or of any other participant in any hearing on the Application, as may be appropriate in the circumstances of any hearing on the Application that may be ordered by the Board;

- d) calling witnesses, including expert witnesses, as may be appropriate in the circumstances of any hearing on the Application that may be ordered by the Board; and
- e) making representations and submissions, through counsel, to the Board concerning the disposition of the Application, including without limiting the foregoing with respect to the awarding of costs with respect to their participation in the Application proceedings.

Documents relating to this hearing can be served on the Island Industrial Customers Group in care of:

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Canada A1C 6K3

Telephone: 709.722.4270

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AND

Mr. Dean A. Porter
Poole Althouse
Western Trust Building
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P.O. Box 812
Corner Brook NL A2H 6H7

Telephone: 709.637-6425


Facsimile: 709.634.8247

E-Mail: dporter@pa-law.ca

DATED at St. John's, Newfoundland and Labrador, this 30th day of August, 2013.

POOLE ALTHOUSE

Per: 

 Dean A. Porter

STEWART MCKELVEY

Per: 

Paul L. Coxworthy

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

TO: Newfoundland & Labrador Hydro
P.O. Box 12400
500 Columbus Drive
St. John's NL A1B 4K7
Attention: Geoffrey P. Young
Legal Counsel

TO: Newfoundland Power
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Attention: Peter Alteen and Gerard Hayes
Legal Counsel

TO: Thomas J. Johnson, Consumer Advocate
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TO: Mr. Thomas J. O'Reilly Q.C.
Vale Newfoundland and Labrador Limited
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