



January 31, 2014

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

Dear Ms. Blundon:

Re: Supply Issues and Power Outages on the Island Interconnected System
Re: Intervenor Submission and Proposed List of Issues of the Consumer Advocate

Enclosed please find an original and eight (8) copies of the Consumer Advocate's Intervenor Submission and an original and eight (8) copies of the Consumer Advocate's Proposed List of Issues.

As the Board's letters to Hydro and Newfoundland Power of January 17, 2014 indicate that both utilities are considered parties in the proceeding, a copy of this correspondence and Intervenor Submission as well as the Proposed List of Issues have been sent to each utility.

As regards the Consumer Advocate's Proposed List of Issues, this is submitted in response to the Board's invitation in its January 17, 2014 letter to file a proposed list of issues in advance of the pre-hearing conference for the consideration of the Board. The Board's letter stated that its investigation is initially focused on whether load requirements on the Island Interconnected system can be met in the near term, but stated that the Board may also inquire into issues such as asset readiness, maintenance practices, load forecasting, planning criteria and assumptions, equipment performance and reliability, preparedness, system response and restoration efforts. The Consumer Advocate agrees with the Board's initial focus being directed to whether load requirements can be met in the short term, but also agrees that the other issues raised by the Board are worthy of further inquiry.

Accordingly, it is hoped that the Consumer Advocate's Proposed List of Issues are of assistance to the Board. The Consumer Advocate recognizes that the utilities and perhaps other interested persons or groups will put forward their respective proposed list of issues in the near future, so it is recognized that there may be other issues raised that are not identified in the enclosed list that the Board may find it reasonable to inquire into.

We trust this is found to be in order.

Yours very truly,

O'DEA, EARLE



THOMAS JOHNSON

TJ/cel

Encl.

cc: Newfoundland Power Inc.
Mr. Gerard Hayes

Newfoundland and Labrador Hydro
Mr. Geoffrey Young

1 **IN THE MATTER OF** the *Public Utilities Act*,
2 R.S.N.L., c. P-47, (the "Act"); and

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4 **IN THE MATTER OF** the Board's investigation
5 and hearing into supply issues and power
6 outages on the Island Interconnected system
7 (the "Proceeding").
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12 To: The Board of Commissioners of Public Utilities of Newfoundland and Labrador
13 Suite E 210, Prince Charles Building
14 120 Torbay Road
15 P.O. Box 21040
16 St. John's, NL A1A 5B2
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18 Attention: Ms. Cheryl Blundon, Board Secretary
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21 **Intervenor's Submission**
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24 **General**
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- 26 1. The Consumer Advocate wishes to become an Intervenor in the Proceeding.
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28 **Interests of the Consumer Advocate**
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- 30 2. The Consumer Advocate has been appointed under the authority of Section 117 of the
31 *Act* to represent the interests of domestic and general service customers.
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33 3. The supply issues and power outages on the Island Interconnected system in late
34 December 2013 and early January 2014 affected domestic and general service
35 customers on the Island Interconnected system.
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37 4. The Consumer Advocate has an interest in the Proceeding as the matters to be inquired
38 into directly impact domestic and general service customers.
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40 **Disposition Advocated by the Consumer Advocate**
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1 5. By Notice of Hearing and Pre-Hearing Conference issued by the Board on January 17,
2 2014 the Board stated that it will hold a pre-hearing conference to open the hearing,
3 pursuant to the *Public Utilities Act*, R.S.N. 1990, c. P-47, into the events and
4 circumstances surrounding and leading up to the supply issues and power outages on
5 the Island Interconnected system in late December 2013 and early January 2014.

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7 6. The Board's Notice of Hearing and Pre-Hearing Conference stated that while its
8 investigation is initially focused on whether load requirements on the Island
9 Interconnected system can be met in the near term the Board may also inquire into other
10 issues such as asset readiness, maintenance practices, load forecasting, planning
11 criteria and assumptions, equipment performance and reliability, emergency
12 preparedness, system response, and restoration efforts.

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14 7. The Board's Notice of Hearing and Pre-Hearing Conference stated that the Board is
15 seeking input and concerns that should be addressed by the Board in this Proceeding.

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17 8. Accordingly, at this stage, it would be premature for the Consumer Advocate to advocate
18 a particular disposition.

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20 **Facts and Reasons Supporting Intervention**

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22 9. The reason for the Consumer Advocate's intervention is to receive and consider
23 information and to participate in the Proceeding on behalf of general and domestic
24 electricity consumers. Until the Consumer Advocate has had an opportunity to gain a
25 satisfactory understanding of the matters to be considered in the Proceeding, the
26 Consumer Advocate will not be in a position to submit what facts he intends to show in
27 evidence or for what reasons the Board should dispose of the Proceeding in a particular
28 manner.

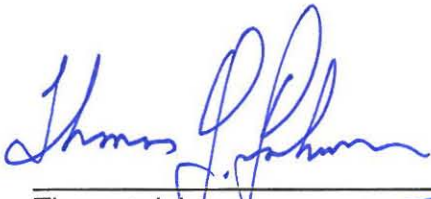
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30 **Participation of the Consumer Advocate**

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32 10. The Consumer Advocate proposes to fully participate in the Proceeding and the various
33 procedures associated with the Proceeding including, as appropriate:
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- 1 (a) directing information requests as may be permitted by the Board;
2 (b) participating in technical conferences or similar processes mandated by the
3 Board;
4 (c) cross-examining of witnesses on behalf of Hydro or any other party;
5 (d) calling of witnesses, including expert witnesses, as is appropriate; and
6 (e) making representations to the Board concerning the Proceeding.

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8 Dated at St. John's in the Province of Newfoundland and Labrador, this 31ST day of January,
9 2014.

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