

Office of the Consumer Advocate

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February 23, 2018

Board of Commissions of Public Utilities
120 Torbay Road, P.O. Box 2140
St. John's, NL A1A 5B2

Attention: Jacqui Glynn, Counsel to the Board

Dear Ms. Glynn:

**Re: NL Hydro 2018 Capital Budget Application -
Applications for Intervenor Status: February 16, 2018
Labrador Interconnected Customers / IOC**

The Consumer Advocate has reviewed both of the foregoing applications for Intervenor status dated February 16, 2018, as well as NL Hydro's response dated February 22 objecting to these applications.

The Consumer Advocate notes that there is no time limitation set out in the *Public Utilities Act* or the Regulations made thereto for a party to apply for intervenor status.

Upon review of the recent Intervenor Applications filed, they do appear to be fully informed and present a reasoned justification for seeking intervenor status and, without doubt, the intervenors' rights will be directly impacted by the Board's final Order in this matter.

Therefore, the Consumer Advocate fully supports both intervenors' submissions.

The Consumer Advocate also notes that Section 118(1) of the *Public Utilities Act* specifically states that the Act "shall be interpreted and construed liberally in order to accomplish its purposes". The Consumer Advocate submits that disallowing an interested stakeholder at this point to become substantively involved in the hearing would be unnecessarily restrictive and contrary to Section 118 of the Act.

Yours truly,



Stephen Fitzgerald
Counsel to the Consumer Advocate

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