

**Board of Commissioners of Public Utilities
Newfoundland and Labrador**

Intervenor Submission Form

All information provided on this form will be placed on the public record for this proceeding

Proceeding

Newfoundland Power Inc. 2019 - 2020 General Rate Application

Intervenor Information

| | |
|--|---|
| Name: Donald Murphy | Mailing Address: 67 Lemarchant Road |
| Title: Business Manager/Financial Secretary | City: St. John's |
| Organization: International Brotherhood of Electrical Workers, Local 1620 | Province: Newfoundland & Labrador |
| Telephone: 709-753-6071 | Postal Code: A1C 2G9 |
| Facsimile: 709-722-5203 | Email: don@ibew1620.com |
| Address for delivery (if different from mailing address): c/o Mark Murray Martin Whalen Hennebury Stamp 15 Church Hill, PO Box 5910 St. John's, NL A1C 5X4 | |

Legal Counsel / Representative (if applicable)

| | |
|---|--|
| Name: Mark Murray | Mailing Address: 15 Church Hill, PO Box 5910 |
| Title: Barrister & Solicitor | City: St. John's |
| Organization: Martin Whalen Hennebury Stamp | Province: Newfoundland & Labrador |
| Telephone: 709-754-1400 | Postal Code: A1C 5X4 |
| Facsimile: 709-754-0915 | Email: mmurray@mwhslaw.com |
| Address for delivery (if different from mailing address): N/A | |

Interest in the Proceeding

List the topics/issues you are interested in and the proposed disposition.

The International Brotherhood of Electrical Workers, Local 1620 (the "IBEW 1620") is generally interested in the entirety of the Application, and more specifically the topics/issues outlined at sections 21, 2.2, 2.3, 2.4.1, 3.2.4, report 1 - Labour Forecast: 2018 to 2020, and the expert evidence of Mr. James Coyne (Cost of Capital).

The IBEW 1620's proposed disposition is to present evidence and argument as to the impact the proposed rate change(s) may have on the employees of Newfoundland Power Inc.. This evidence will be presented through written evidence, cross examination of witnesses relied on by the Applicant, and potentially expert evidence, which expert information will be available prior to the pre-hearing conference scheduled for June 27, 2018.

What facts or documentation will you rely on to support your intervention?

The IBEW 1620 will rely on the fact it is the sole and exclusive bargaining agent for the unionized workforce of Newfoundland Power Inc., and as such it has information uniquely available to it, respecting the potential impact the proposed rate change(s) may have on its membership. The IBEW 1620 will rely on its unique position to support its intervention in this Application, to ensure the impact, concerns, and potential consequences which may be experienced by the employees of Newfoundland Power Inc. are properly and thoroughly presented, such that they may be appropriately considered in making determination in this Application.

The IBEW 1620 will rely on its own unique position and information to support its intervention, which will be presented through written evidence, its own witnesses, cross examination of witnesses, and in the alternative the IBEW 1620 may engage an expert to assist in the representation of its issues, which expert's information will be forthcoming in short order, and be available prior to the pre-hearing conference.

How is your interest unique and not represented by others?

The IBEW 1620 is the sole and exclusive bargaining agent for the unionized workforce of Newfoundland Power Inc. (including both the Craft and Clerical bargaining units). As the sole bargaining agent, IBEW 1620 has unique insight and knowledge of the labour force of Newfoundland Power Inc., as well as to the potential impact that the proposed rate change(s) may have on these employees.

As the sole and exclusive bargaining agent for the unionized workforce of Newfoundland Power Inc., no other party has the ability and/or knowledge to appropriately represent the interests of the IBEW 1620 and its members.

Participation in the Proceeding

Do you intend to:

- i. Appear throughout the hearing Yes No
- ii. Submit written evidence Yes No
- iii. Ask written questions on the application Yes No
- iv. File expert reports Yes No
- v. Call witnesses Yes No
- vi. Cross examine witnesses Yes No
- vii. Present final argument Yes No

If you intend to call expert witness(es) provide the following information on a separate attachment for each witness: Name of witness, address, qualifications, and subject/issue that will be addresses by the witness


Signature

June 20, 2018

Date

Completed forms may be submitted by mail, courier, fax or email at the addresses below:

Mail
Board of Commissioners of Public Utilities
P.O. Box 21040
St. John's, NL
Canada, A1A 5B2

Courier/Hand delivered
Board of Commissioners of Public Utilities
120 Torbay Road
Prince Charles Building, Suite E-210
St. John's, NL
A1A 5B2

Facsimile/email
F: 709-726-9604
E: ito@pub.nl.ca