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HAND DELIVERED

August 24, 2006

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

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

Ladies and Gentlemen:

**Re: Newfoundland and Labrador Hydro
2006 General Rate Application**

Please find enclosed the original and 14 copies of Newfoundland Power's Intervenor's Submission in respect of Newfoundland and Labrador Hydro's 2006 General Rate Application.

For convenience, the Intervenor's Submission is provided on three-hole punched paper.

A copy of this letter, together with enclosures, has been forwarded directly to the parties listed below. An electronic copy in pdf format will follow.

If you have any questions regarding the enclosed, please contact the undersigned at your convenience.

Yours very truly,



Peter Alteen
Vice President, Regulatory Affairs
& General Counsel

c. Geoffrey Young
Newfoundland & Labrador Hydro

Thomas Johnson
O'Dea Earle Law Offices

Joseph Hutchings, Q.C.
Poole Althouse

Paul Coxworthy
Stewart McKelvey



Join us in the fight against cancer.

IN THE MATTER OF the Public
Utilities Act, R .S.N. 1990, Chapter P-47
(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

A. General

1. Newfoundland Power Inc. ("Newfoundland Power") wishes to intervene in the Application.

B. Interest of Newfoundland Power

2. Newfoundland Power purchases approximately 70% of Newfoundland and Labrador Hydro's ("Newfoundland Hydro") annual production of electrical energy on the Island of Newfoundland for resale to consumers. Electrical energy purchased from Newfoundland Hydro for resale is Newfoundland Power's largest single expense, estimated to be approximately \$260 million in 2007. Newfoundland Hydro's Application, filed in this proceeding, requests amongst other things, that the Board approve an increase in the price of electrical energy purchased by Newfoundland Power.
3. As Newfoundland Hydro's largest customer, Newfoundland Power's interest in the Application includes, without limitation, an interest in ensuring that the rates to be charged for electricity and the rules and regulations governing the provision of electrical service are just and reasonable in accordance with the provisions of the Act, the *Electrical Power Control Act, 1994*; the *Hydro Corporation Act* and all regulations made pursuant thereto.

C. Disposition Advocated by Newfoundland Power

4. Until Newfoundland Power has had an opportunity to gain a satisfactory understanding of the matters to be considered in the Application, Newfoundland Power will not be in a position to advocate a specific disposition of the Application.

D. Facts and Reasons Supporting Intervention

5. Until Newfoundland Power has had an opportunity to gain a satisfactory understanding of the matters to be considered in the Application, Newfoundland Power will not be in a position to submit what facts it intends to show in evidence or for what reasons the Board should dispose of the Application of Newfoundland Hydro in a particular matter.

E. Participation of Newfoundland Power

6. Newfoundland Power proposes to fully participate in the hearing of the Application and the various procedures associated with the Application including, without limitation:
 - (a) directing information requests to Newfoundland Hydro as may be permitted by the Board;
 - (b) participating in technical conferences or similar processes mandated by the Board;
 - (c) cross-examining of witnesses appearing on behalf of Newfoundland Hydro or any other party;
 - (d) calling of witnesses, including expert witnesses, as is appropriate in the circumstances; and
 - (e) making representations through counsel to the Board concerning the disposition of the Application.

DATED at St. John's, Newfoundland this 24th day of August, 2006.

NEWFOUNDLAND POWER INC.



Ian Kelly, Q.C. and Peter Alteen
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