



November 9, 2015

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

Dear Ms. Blundon:

**Re: Newfoundland Power 2016-2017 General Rate Application
Intervenor's Submission of the Consumer Advocate**

In relation to the above noted application and further to the Notice of Application issued by the Public Utilities Board on October 31, 2015, we enclose the Intervenor's Submission of the Consumer Advocate.

A copy of this correspondence, together with the enclosure, has been forwarded directly to the parties listed below.

We trust the foregoing is found to be in order.

Yours very truly,

O'DEA, EARLE

A handwritten signature in blue ink, appearing to read "Thomas Johnson", is written over the printed name.

for THOMAS JOHNSON, Q.C.

TJ/cel

encl.

cc: Newfoundland and Labrador Hydro
Attention: Geoffrey P. Young

Newfoundland Power Inc.
Attention: Gerard Hayes

IN THE MATTER OF the Public Utilities Act, R.S.N. 1990, Chapter P-47, as amended (the “Act”); and

IN THE MATTER OF a General Rate Application (the “Application”) by Newfoundland Power Inc. (“Newfoundland Power”) to establish customer electricity rates for 2016 and 2017.

To: The Board of Commissioners of Public Utilities (the “Board”)

INTERVENOR’S SUBMISSION OF THE CONSUMER ADVOCATE

Interest of the Consumer Advocate

1. By Order-in-Council made pursuant to Section 117 of the Public Utilities Act, R.S.N. 1990, c. P-47, Thomas Johnson was appointed as Consumer Advocate to represent the interests of domestic and general service consumers in relation to the Application of Newfoundland Power.
2. The Consumer Advocate’s interest in the Application includes, without limitation, an interest in ensuring that rates to be charged for electricity are just and reasonable in accordance with the Act, the Electrical Power Control Act, 1994, and all regulations made thereto.

Disposition Advocated by the Consumer Advocate

3. In light of the recent filing of the Application and the matters and questions still remaining to be addressed in the Request for Information process and hearing process, it would be premature to advocate a particular disposition to the various issues raised in the Application.

Facts and Reasons Supporting Intervention

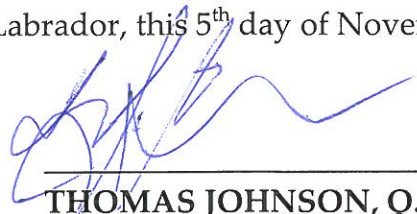
4. As stated above in paragraph 3 hereof, it would be premature for the Consumer Advocate to decide what facts it intends to show in evidence or for what reasons the Board should dispose of the Application of Newfoundland Power in a particular manner.

Participation of the Consumer Advocate

5. The Consumer Advocate proposes to fully participate in the hearing of the Application filed by Newfoundland Power, including, without limitation:
 - (a) directing information requests to Newfoundland Power;
 - (b) cross-examining of witnesses appearing on behalf of Newfoundland Power or any other party;

- (c) calling of witnesses, including expert witnesses, as is appropriate in the circumstances;
- (d) making representations to the Board concerning the disposition of the Application.

DATED AT St. John's, Newfoundland and Labrador, this 5th day of November, 2015.



THOMAS JOHNSON, Q.C.
CONSUMER ADVOCATE

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To: Mr. Gerard Hayes
Counsel for Newfoundland Power Inc.

To: Mr. Geoffrey P. Young
Counsel for Newfoundland and Labrador Hydro