

November 10, 2015

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

ATTENTION: Ms. Cheryl Blundon
Director of Corporate Services & Board Secretary

Dear Ms. Blundon:

Re: Newfoundland power 2016/2017 General Rate Application

Enclosed please find the original and twelve copies of Newfoundland and Labrador Hydro's Intervenor's Submission with regard to Newfoundland Power's 2016/2017 General Rate Application.

Should you have any questions or comments, please contact the undersigned.

Yours truly,

Newfoundland and Labrador Hydro



Tracey L. Pennell
Legal Counsel

TLP/bs

cc: Gerard Hayes – Newfoundland Power

Thomas Johnson – Consumer Advocate

IN THE MATTER OF the
Public Utilities Act, (R.S.N.L. 1990, Chapter P-47)
(the *Act*), and regulations thereunder;

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)

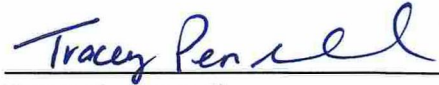
INTERVENOR'S SUBMISSION

1. Hydro is a corporation continued and existing under the *Hydro Corporation Act, 2007*, is a public utility within the meaning of the Act and is subject to the provisions of the *Electrical Power Control Act, 1994*.
2. The Applicant, Newfoundland Power, is Hydro's largest customer, is the primary distribution electrical utility on the Island of Newfoundland, and purchases approximately 90% of the energy that it sells to its customers from Hydro.
3. Hydro's rates for sales to non-Industrial Island Interconnected customers and to its isolated customers are the same rates, or are based upon the rates, set by this Board for Newfoundland Power's customers.
4. The regulatory principles used in ratemaking for Newfoundland Power are relevant to Hydro because many issues and principles apply equally to both utilities.
5. 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 for Hydro to advocate a particular disposition. Until Hydro has had an opportunity to gain a satisfactory understanding of the matters to be considered in the Application, Hydro will not be in a position to advocate a specific disposition of the Application.

6. Until Hydro has had an opportunity to gain a satisfactory understanding of the matters to be considered in the Application, it would be premature for Hydro to submit 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.
7. Hydro is requesting Intervenor status for the purposes of obtaining all information filed in the proceeding and proposes to participate in the hearing of the Application filed by Newfoundland Power, including, without limitation:
 - (a) Directing information requests to Newfoundland Power;
 - (b) Cross-examining witnesses appearing on behalf of Newfoundland Power or any other party;
 - (c) Calling witnesses, including expert witnesses, as is appropriate in the circumstances; and
 - (d) Making representations to the Board concerning the disposition of the Application.

DATED at St. John's, in the Province of Newfoundland and Labrador, this 10th day of November, 2015.

A handwritten signature in blue ink, reading "Tracey Pennell", written over a horizontal line.

Tracey L. Pennell
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