

WHENEVER. WHEREVER.  
We'll be there.



HAND DELIVERED

September 12, 2017

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 – 2017 General Rate Application**

Please find enclosed the original and 10 copies of Newfoundland Power's Intervenor's Submission in relation to the above-noted 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.

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

Yours very truly,

A handwritten signature in black ink, appearing to read "Gerard M. Hayes".

Gerard M. Hayes  
Senior Counsel

Enclosures

c. Tracey Pennell  
Newfoundland and Labrador Hydro

Paul Coxworthy  
Stewart McKelvey

Larry Bartlett  
Teck Resources Limited

Dennis Browne, QC  
Browne Fitzgerald Morgan & Avis

Thomas O'Reilly, QC  
Vale Newfoundland and Labrador Limited

Sheryl Nisenbaum  
Praxair Canada Inc.

**Newfoundland Power Inc.**

55 Kenmount Road • P.O. Box 8910 • St. John's, NL A1B 3P6

PHONE (709) 737-5609 • FAX (709) 737-2974 • [ghayes@newfoundlandpower.com](mailto:ghayes@newfoundlandpower.com)

**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 and Labrador Hydro 2017 General Rate Application**

**Intervenor Information**

Name: <b>Newfoundland Power Inc.</b>	Mailing Address: <b>P.O. Box 8900</b>
Title:	City: <b>St. John's</b>
Organization:	Province: <b>Newfoundland and Labrador</b>
Telephone: <b>(709) 737-5609</b>	Postal Code: <b>A1B 3P6</b>
Facsimile: <b>(709) 737-2974</b>	Email: <b>ghayes@newfoundlandpower.com; lobrien@curtisdawe.nf.ca</b>
Address for delivery (if different from mailing address): <b>55 Kenmount Road, St. John's</b>	

**Legal Counsel / Representative (if applicable)**

Name: <b>Liam O'Brien and Gerard Hayes</b>	Mailing Address: <b>same as above</b>
Title:	City: <b>same as above</b>
Organization:	Province: <b>same as above</b>
Telephone: <b>same as above</b>	Postal Code: <b>same as above</b>
Facsimile: <b>same as above</b>	Email: <b>same as above</b>
Address for delivery (if different from mailing address): <b>same as above</b>	

**Interest in the Proceeding**

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

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 list the topics/issues it is interested in, or to advocate a specific disposition of the Application.

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

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 or documents it will rely on to support its intervention.

How is your interest unique and not represented by others?

Newfoundland Power purchases approximately 83% of Newfoundland and Labrador Hydro's ("Hydro") annual production of electrical energy on the Island of Newfoundland for resale to consumers. Electrical energy purchased from Hydro for resale is Newfoundland Power's largest single expense totaling approximately \$443 million in 2016. The Application requests, amongst other things, that the Board approve changes to Hydro's customer rates that will affect the price of electrical energy for Newfoundland Power's customers.

As 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.

**Participation in the Proceeding**

Do you intend to:

- i. Appear throughout the hearing  Yes  No
- ii. Submit written evidence  Yes  No Unknown at this time.
- iii. Ask written questions on the application  Yes  No
- iv. File expert reports  Yes  No Unknown at this time.
- v. Call witnesses  Yes  No Unknown at this time.
- 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

I, Newfoundland Power Inc., agree to respect the rules of the procedure and the dates and deadlines established for this proceeding and I will responsibly represent the interest(s) set out in this form and the parameters established by the Board for my participation.

  
Signature

September 12, 2017  
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](mailto:ito@pub.nl.ca)