PUBLIC UTILITIES BOARD

Reference on Rate Mitigation Option and Impacts Relating to the Muskrat Falls Project

REQUEST FOR STANDING

I. CONTACT INFORMATION

Name:	Please see attachment for complete list.	
Organization: Title:		
Address:	Mailing	Address for Delivery, if different from Mailing address
Phone: Email:		

II. INTEREST IN THE REFERENCE

Please provide detailed responses to each of the following:

1. How will your participation assist in the Board's consideration of the Reference Questions?

Our participation will reflect the interests of Labrador Interconnected System domestic ratepayers, only insofar as those interests may diverge from the interests of other ratepayers in the Province. Labrador Interconnected System ratepayers are served by a separate electrical system than ratepayers on the Island, with different generation and transmission assets, different costs of service, and different rates. As such, proposals for rate mitigation measures may impact Labrador Interconnected System ratepayers differently than Island ratepayers.

We intend to represent the perspective of Labrador Interconnected System ratepayers so as to provide the Board with the information it needs to approach the Reference Questions with the interests of all ratepayers, including Labradorians, in mind.

2. How is your interest unique and not represented by others, including the Consumer Advocate?

This application represents the interests of domestic ratepayers on the Labrador Interconnected System, being the communities of Sheshatshiu, Happy Valley-Goose Bay, Wabush, and Labrador City. Although the Consumer Advocate represents the interests of all ratepayers, there may be times when the interests of Island consumers diverge from those on the Labrador Interconnected System. Moreover, the particular interests of certain Island consumers are likely to be represented by Newfoundland Power, which is also likely to seek standing. We propose to represent Labrador Interconnected System customers only where those diverge from the general interests of all ratepayers.

- 3. List all of the topics and issues of interest to you or your organization:
 - Rate design
 - Revenue opportunities related to recall block
 - Costs and revenue opportunities for NLSO transmission system
 - Rate mitigation measures insofar as they affect the Labrador Interconnected System
 - Rate mitigation measures insofar as they affect taxpayers in the Province

III. LEVEL OF PARTICIPATION IN THE REFERENCE

Do you intend to :					<u>YES</u>	<u>NO</u>	
	i)	File expert reports			Χ		
	ii)	Appear throughout the hearing	g				
	iii)	Make a Presention(s)	0		X		
	iv)	Question Presenter(s)			X		
	vi)	File a submission			X		
	VI)	riie a subiiiissioii			^		
IV. LEGAL COU	JNSEL/ REP	RESENTATIVE(if applicable)					
Name:	Senwung	Luk					
Firm:	Olthuis Kl	eer Townshend LLP					
Address:	Mailing			Address for Delivery, if different from Mailing address			
	250 University Ave, 8th Fl						
	Toronto C	ON M5H 3E5					
Phone:	416-981-9	9443					
Email:	sluk@okt	law.com					
1	- L	L	11	March 2019			
Signature			Da	te			

Information:

- 1. All information provided on this form will be placed on the public record for this Reference.
- 2. This form is formatted as a pdf*. Please complete and download to sign.
- 3. Completed forms must be received by the Board on or before March 11, 2019.
- 4. Forms may be submitted by mail, courier or email to one of the following addresses:

Mail Cheryl Blundon, Board Secretary Board of Commissioners of Public Utilities P.O. Box 21040	Courier/ Hand Delivery Cheryl Blundon, Board Secretary Board of Commissioners of Public Utilities 120 Torbay Road	Email rmreview@pub.nl.ca
St. John's, NL A1A 5B2	Prince Charles Building Suite E-210 St. John's, NL	