

May 26, 2023

VIA E-MAIL cblundon@pub.nl.ca

Cheryl Blundon
Director of Corporate Services and Board Secretary
The Board of Commissioners of Public Utilities
Prince Charles Building
120 Torbay Road, P.O. Box 21040
St. John's, NL A1A 5B2

Dear Ms. Blundon:

Re: Newfoundland and Labrador Hydro 2021 Supplemental Capital Budget Application Approval of the Construction of Phase 1 of Newfoundland and Labrador Hydro's Long-term Supply Plan for Southern Labrador

Request for Intervenor Status - NunatuKavut Community Council

I represent the NunatuKavut Community Council ("NCC"). Further to the above-noted Application currently before the Board of Commissioners of Public Utilities, NCC hereby requests recognition as an intervenor in this proceeding.

NCC's Interest in the Matter

As you are aware, the Application before the Board in this matter is in regards to the development of a long-term power supply plan that interconnects several Southern Labrador communities, including Charlottetown, Pinsent's Arm, Mary's Harbour, Port Hope Simpson, and St. Lewis (the "Southern Labrador Communities").

NCC is the representative governing body for approximately 6,000 Inuit of south and central Labrador, many of whom reside in the Southern Labrador Communities and are directly affected by the proposed plans.

There is no question that regulatory decisions and plans that are developed in this Application will be applicable to NCC and its members as set out in NCC's letter dated November 4, 2021. Further, NCC has requested that it be engaged on any discussions

on energy solutions in its communities. This request for intervenor status will ensure appropriate and fulsome engagement of NCC in this proceeding.

Disposition Advocated by NCC

As of the date of this submission, NCC is aware that the Applicant, Newfoundland and Labrador Hydro (“Hydro”), has recently submitted an independent analysis and report authored by Midgard Consulting Inc. (the “Midgard Report”), and intends to amend the Application based on the findings in the Midgard Report in May 2023.

Given the early stages and dynamic nature of this proceeding, it appears premature for NCC to advocate a particular disposition:

- Until NCC has had an opportunity to gain a satisfactory understanding of the matters to be considered in the Application, NCC will not be in a position to advocate a specific disposition; and
- Until NCC has had an opportunity to gain a satisfactory understanding of the matters to be considered in the Application, it would be premature for NCC to submit details of any facts it intends to show in evidence or the reasons for which the Board should dispose of the Application in a particular manner.

NCC's Participation in the Hearing

NCC is requesting Intervenor status for the purposes of obtaining all information filed in the proceeding. NCC's participation may include, but may not be limited to, any or all of the following activities:

- i. Directing information requests to Hydro;
- ii. Participation in technical and all other conferences;
- iii. Cross-examining witnesses appearing on behalf of Hydro or any other party;
- iv. Calling witnesses, including expert witnesses, as is appropriate in the circumstances; and
- v. Making representations to the Board concerning the Application and/or the disposition thereof.

NCC has been in contact with representatives of Hydro regarding this request for intervenor status and understands that Hydro is supportive of NCC's involvement in this Application as an intervenor.

I appreciate your consideration of NCC's request for intervenor status in this Application. If you have any questions or concerns, please do not hesitate to contact me

Yours very truly,
BURCHELL WICKWIRE BRYSON ^{LLP}

A handwritten signature in blue ink, consisting of a stylized initial 'J' followed by the name 'Cooke' in a cursive script.

Jason T. Cooke, K.C.