

**IN THE MATTER OF** the *Electrical Power Control Act*, 1994, SNL 1994, Chapter E-5.1 (“EPCA”) and the *Public Utilities Act*, RSNL 1990, Chapter P-47 (“Act”), and regulations thereunder; and

**IN THE MATTER OF** an application by the Iron Ore Company of Canada (“IOC”) pursuant to Section 70 of the Act for approval of a rate for Non-Firm Service in Labrador and other associated matters (“Application”).

### **INTERVENOR’S SUBMISSION OF IRON ORE COMPANY OF CANADA**

**TAKE NOTICE** that Iron Ore Company of Canada, through its solicitors Stewart McKelvey, hereby give notice of their intention to participate in the within Application for the reasons and upon their interests as outlined herein.

#### **INTRODUCTION AND INTEREST OF IRON ORE COMPANY OF CANADA**

1. Iron Ore Company of Canada (“IOC”) is a leading North American producer and exporter of premium iron ore pellets and high-grade iron ore concentrate. Its operations include, in relevant part, a mine with five operational pits, a concentrator and a pelletizing plant, all located near Labrador City, Newfoundland and Labrador.
2. IOC’s interest in this proceeding is predicated upon IOC’s overarching interest in all manner of activities which could or will have an impact upon the electrical system in Labrador, including in relation to the rates charged by NL Hydro and the transmission service IOC receives from NL Hydro.
3. At this stage, and based on the information currently available to it, IOC is interested in the potential long-term implications for IOC of the non-firm rate for Labrador proposed by the Applicant and, among other things:
  - (a) increased demand on existing generation and transmission assets; and

- (b) the potential need for additional generation and transmission assets, and their impacts on rates paid by consumers of electricity in Labrador.
4. If IOC's intervention application is accepted, it anticipates addressing these and other ancillary issues as may arise during the course of the Application.

**DISPOSITION SOUGHT BY IOC**

5. IOC anticipates taking a position in this Application after reviewing the evidence disclosed during the Application.
6. Given the recent filing of the Application, the various matters raised by it and the anticipated generation of additional information, including the development of evidence through the Request for Information and other processes, IOC has not yet been able to determine what it may assess as an appropriate disposition of the Application.

**FACTS AND REASONS SUPPORTING INTERVENTION**

7. IOC anticipates citing appropriate facts and reasons supporting any position it takes, or disposition it may advocate for, upon review of the evidence disclosed during the Application.
8. Additionally, IOC states that it has not yet had sufficient opportunity to properly or fully consider what facts it may propose to show in evidence. Recognizing, as stated above, that IOC has yet to formulate a position as to an appropriate disposition of the Application, IOC is unable to state the reasons why IOC believes the Board should decide the Application in any particular manner.
9. IOC's position is that its interest in the Application, as set out above, is sufficient to ground its participation as an intervenor in the Application.

**PARTICIPATION OF IOC**

10. IOC requests to participate in the various procedures associated with the Application, including, without limitation:

- (a) Directing Requests for Information and other information requests to the Applicant as may be permitted by the Board;
- (b) Participating in technical conferences, pre-hearing conferences and other processes associated with the Application;
- (c) Cross-examining witnesses appearing on behalf of the Applicant or of any other participant in any hearing on the Application, as may be appropriate in the circumstances of any hearing on the Application that may be ordered by the Board;
- (d) Calling witnesses, including expert witnesses, as may be appropriate in the circumstances of any hearing on the Application that may be ordered by the Board;  
and
- (e) Making representations and submissions, through counsel, to the Board concerning the disposition of the Application, including for the award of costs to IOC respect of their intervention and participation in the Application.

11. Documents relating to this Application may be served on IOC in care of:

Gregory A.C. Moores  
Stewart McKelvey  
Suite 1100, Cabot Place  
100 New Gower Street  
St. John's, NL A1C 6K3

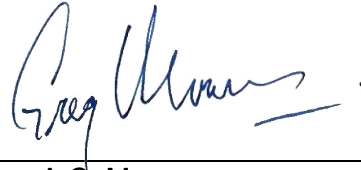
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**DATED** at St. John's, Newfoundland and Labrador, this 21<sup>st</sup> day of October, 2022.

STEWART MCKELVEY

Per:



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Gregory A.C. Moores

Ecc:

**Board of Commissioners of Public Utilities**

Jacqui H. Glynn  
PUB Official email

**Island Industrial Customer Group**

Paul L. Coxworthy, Stewart McKelvey  
Denis Fleming, Cox & Palmer  
Dean A. Porter, Poole Althouse

**Praxair Canada Inc.**

Sheryl E. Nisenbaum  
Peter Strong

**Teck Resources Limited**

Shawn Kinsella

**Blockchain Labrador Corp.**

Paul Dicks  
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**Labrador Interconnected Group**

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**Consumer Advocate**

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**Newfoundland Power Inc.**

Dominic J. Foley  
Lindsay S.A. Hollett  
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