

**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 Newfoundland and Labrador Hydro (“Hydro”) pursuant to Section 70 of the Act for approval of a rate for Non-Firm Service in Labrador, and other associated matters (“Application”).

## **APPLICATION OF THE LABRADOR INTERCONNECTED GROUP**

### **THE APPLICATION OF THE LABRADOR INTERCONNECTED GROUP STATES:**

#### **Introduction**

1. The Labrador Interconnected Group (the “LIG”) jointly represents the communities of Sheshatshiu, Happy Valley-Goose Bay, Wabush, and Labrador City. The businesses and residents of these communities are ratepayers in the Labrador Interconnected System. By way of this application, the Labrador Interconnected Group seeks to be recognized as an intervener in this Application.

#### **Interest of the Labrador Interconnected Group**

2. The Labrador Interconnected Group, if accepted as an intervener, would be the only party representing the interests of Labrador domestic consumers in this Application. At this stage, and based on the information currently available to it, the Labrador Interconnected Group has

concerns about the potential long-term implications of the non-firm rate for the Labrador Interconnected System, including, 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 the Labrador Interconnected Group.
3. If the Labrador Interconnected Group's intervention application is accepted, it will address these issues, among others, in the Application.

**Disposition sought by the Labrador Interconnected Group**

4. The Labrador Interconnected Group intends to take a position in this Application after reviewing the evidence disclosed during the Application.

**Facts and Reasons Supporting Intervention**

5. The Labrador Interconnected Group intends to cite appropriate facts and reasons supporting our position after reviewing the evidence disclosed during the Application.

**Participation of the Labrador Interconnected Group**

6. The Labrador Interconnected Group intends 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 the LIG in respect of their intervention and participation in the Application.
7. Documents relating to this Application may be served on the Labrador Interconnected Group in care of:

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DATED at Toronto, Ontario, this 19<sup>th</sup> day of October, 2022.

*OLTHUIS KLEER TOWNSHEND LLP*



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