

June 15, 2009

The Board of Commissioners of Public Utilities  
Prince Charles Building  
120 Torbay Road, P.O. Box 21040  
St. John's, NL  
A1A 5B2

**ATTENTION: Ms. Cheryl Blundon**  
**Director of Corporate Services & Board Secretary**

Dear Ms. Blundon:

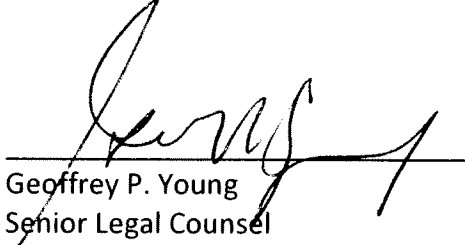
**Re: Newfoundland Power 2010 General Rate Application**

Enclosed please find the original and eight copies of Newfoundland and Labrador Hydro's  
Intervenor's Submission with regards to Newfoundland Power's 2010 General Rate  
Application.

If you have any questions or comments, please contact the undersigned.

Yours truly,

**NEWFOUNDLAND AND LABRADOR HYDRO**

  
\_\_\_\_\_  
Geoffrey P. Young  
Senior Legal Counsel

GPY/jc

cc: Gerard Hayes – Newfoundland Power  
Thomas Johnson – Consumer Advocate  
Daniel Simmons – Counsel for Public Utilities Board

**IN THE MATTER OF** the Public  
Utilities Act, (R.S.N.L. 1990, Chapter P-47),  
(the “Act”); and

**IN THE MATTER OF** a general rate  
application (the Application) by  
Newfoundland Power Inc.  
(Newfoundland Power) to establish  
customer electricity rates for 2010.

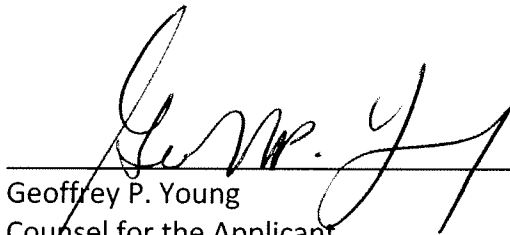
TO: The Board of Commissioners of Public Utilities (the Board)

### **INTERVENOR’S SUBMISSION**

1. Hydro is a corporation continued and existing under the *Hydro Corporation Act, 2007*, is a public utility within the meaning of the Act and is subject to the provisions of the *Electrical Power Control Act, 1994*.
2. The Applicant, Newfoundland Power, Hydro’s largest customer and the primary distribution electrical utility on the Island of Newfoundland, purchases from Hydro approximately 90% of the energy that it sells to its customers.
3. Hydro’s rates for sales to non-Industrial Island Interconnected customers and to its isolated customers are the same rates, or are based upon the rates, set by this Board for Newfoundland Power’s customers.
4. The regulatory principles used in ratemaking for Newfoundland Power are relevant to Hydro because many issues and principles apply equally to both utilities.
5. Hydro is not advocating any specific disposition of the Application at this time.

6. Hydro is requesting Intervenor status for the purpose of obtaining all information filed in the proceeding and so is proposing to participate in a limited fashion to file Requests for Information and to attend technical conferences. Should Hydro become aware of issues or information that require Hydro to participate in the proceeding in a more active capacity, Hydro will apply to the Board for leave to expand the scope of its intervention.

Dated at St. John's, in the Province of Newfoundland and Labrador, this 15<sup>th</sup> day of June, 2009.

A handwritten signature in black ink, appearing to read "G. P. Young", is written over a horizontal line.

Geoffrey P. Young  
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