

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

IN THE MATTER OF an Application by Newfoundland Power Inc. for Adoption in 2011 of Accrual Accounting for Other Post Employment Benefits and Recovery of Associated Costs.

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

INTERVENOR’S SUBMISSION

General

1. The Consumer Advocate wishes to intervene in the Application.

Interests of the Consumer Advocate

2. The Consumer Advocate represents the interests of domestic and general electricity customers of both utilities operating in the Province and therefore has an interest in Newfoundland Power’s proposed application.

Disposition Advocated by the Consumer Advocate

3. It would be premature for the Consumer Advocate to advocate a particular disposition of the Application at this time as the Consumer Advocate’s review of the Application is continuing at this time.

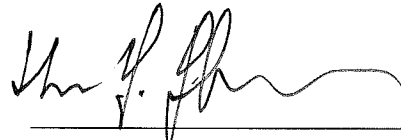
Facts and Reasons Supporting Intervention

4. The reason for the Consumer Advocate’s intervention is to receive and consider materials filed in support of the Application as well as any further evidence that may be filed by way of Requests for Information or otherwise. At this stage, the Consumer Advocate is not in a position to submit what facts he intends to show in evidence or for what reasons the Board should dispose of the various approvals sought by the Application in a particular manner.

Participation of the Consumer Advocate

5. The Consumer Advocate 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-examination of 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;
 - (e) making representations and submission, through counsel, to the Board concerning the disposition of the Application.

DATED at St. John's, in the Province of Newfoundland and Labrador, this 1st day of October, 2010.



THE CONSUMER ADVOCATE

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120 Torbay Road
P.O. Box 21040
St. John's, NL A1A 5B2
Attention: Board Secretary

To: Newfoundland Power Inc.
P.O. Box 8910
55 Kenmount Road
St. John's, NL A1B 3P6
Attention: Mr. Gerard Hayes, Senior Counsel

To: Newfoundland & Labrador Hydro
P.O. Box 12400
500 Columbus Drive
St. John's, NL A1B 4K7
Attention: Mr. Geoffrey P. Young, Senior Legal Counsel