

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

And

IN THE MATTER OF capital expenditures and rate base of Newfoundland Power Inc.;

And

IN THE MATTER OF an Application by Newfoundland Power Inc. for an order pursuant to Sections 41 and 78 of the Act:

- (a) approving its 2012 Capital Budget of \$77,293,000;
- (b) approving certain leases to be entered into in 2012;
- (c) approving certain capital expenditures related to multi-year projects commencing in 2012; and
- (d) fixing and determining a 2010 rate base of \$875,210,000

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 customer of both utilities operating in the Province and therefore has an interest in Newfoundland Power's proposed capital expenditures for 2012.

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 so as to be in a position to assess whether the record before the Board indicates that Newfoundland Power's proposed capital expenditures for 2012 are reasonably necessary for Newfoundland Power to meet its obligations to provide electrical service as required by the Act.

Participation of the Consumer Advocate

5. In light of the Consumer Advocate's ongoing review of the Application, the Consumer Advocate cannot state at this time whether or not he shall present evidence in relation to the Application. The Consumer Advocate may wish to participate in technical conferences, file requests for information and to avail of the right to cross-examine witnesses or to submit argument at a public hearing of the Application, all as the circumstances may require.

DATED at St. John's, in the Province of Newfoundland and Labrador, this 28th day of July, 2011.



THE CONSUMER ADVOCATE

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