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April 20, 2012

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's 2012 Cost of Capital Application

Enclosed please find the original and eight copies of Newfoundland and Labrador Hydro's Intervenor's Submission with regards to Newfoundland Power's 2012 Cost of Capital Application.

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

Yours truly,

NEWFOUNDLAND AND LABRADOR HYDRO

A handwritten signature in black ink, appearing to read 'Peter A. Mickman', written over a horizontal line.

Peter A. Mickman
Assistant Corporate Secretary &
Senior Legal Counsel

PAH/jc

cc: Gerard Hayes – Newfoundland Power
Thomas Johnson – Consumer Advocate

IN THE MATTER OF the *Public Utilities Act*,
(the Act); and

IN THE MATTER OF the establishment of a
just and reasonable return on rate base pursuant
to Section 80 of the Act for Newfoundland
Power Inc. (Newfoundland Power).

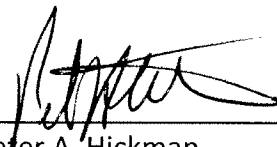
TO: The Board of Commissioners of Public Utilities (the Board)

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 20th day of April, 2012.



Peter A. Hickman
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Senior Legal Counsel
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