

January 16, 2015

**VIA XPRESSPOST and ELECTRONIC MAIL**

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

Attention: Ms. G. Cheryl Blundon  
Director of Corporate Services & Board Secretary

Dear Ms. Blundon:

Re: Submission by the Towns of Labrador City, Wabush, Happy Valley-Goose Bay, North West River (LWHN)

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Attached is our submission on behalf of the Towns with respect to Newfoundland and Labrador Hydro's 2013 Amended General Rate Application for rural customers on Newfoundland and Labrador Hydro's Interconnected System.

We have provided a copy of this correspondence to all concerned parties.

We trust you will find the enclosed satisfactory.

Yours truly,

**MILLER & HEARN**



Edward M. Hearn, Q.C.  
EMH/cc  
Enclosure:

In the Matter of the *Public Utilities Act* R.S.N.L. 1990, Chapter P-47, (the "Act") and the *Electrical Power Control Act*, R.S.N.L. 1994, Chapter E-5.1, (the "EPCA") and;

In the Matter of a General Rate Application (the "Application") by Newfoundland and Labrador Hydro (the "Applicant") dated July 30, 2013 and Amended on November 10, 2014

To: The Board of Commissioners of Public Utilities (the "Board")

**INTERVENOR'S SUBMISSION OF THE TOWNS OF LABRADOR CITY, WABUSH, HAPPY VALLEY-GOOSE BAY AND NORTH WEST RIVER**

**A. General**

1. The Towns of Labrador City, Wabush, Happy Valley-Goose Bay and North West River (LWHN) gives notice of its contingent intention to participate in the General Rate Application of Newfoundland and Labrador Hydro with respect to issues that affect ratepayers in the Labrador Interconnected System (LIS).

**B. Interest of LWHN**

2. LWHN are incorporated municipalities who represent all ratepayers who live in the Labrador Interconnected System.

**C. Disposition Advocated by LWHN**

3. The Towns in the Labrador Interconnected System are in agreement in principle with the submission filed by Newfoundland and Labrador Hydro and note that Hydro has amended its general rate application to reduce the overall impact on ratepayers in the Labrador Interconnected System. Therefore LWHN has no objection to Hydro's amended rate application as submitted.

4. However, it has not been made clear whether other parties to the process will object to the request of Hydro to reduce the overall rate impact for the Labrador Interconnected System from the original increase proposed or whether the Board will require evidence and argument before accepting this submission.

**D. Facts and Reasons Supporting Intervention**


5. The Towns of LWHN wishes to give notice and reserve its right to cross examine and present evidence and argument if Hydro's General Rate Application as it relates to ratepayers in the Labrador Interconnected System is an issue before the Board.

**E. Participation of LWHN**

6. LWHN will contingently intend to participate in the various procedures associated with the Application if Hydro's application to reduce the overall rate impact on ratepayers in the Labrador Interconnected System is an issue before the Board and it may include:
  - a. making request 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 ordering by the Public Utilities Board;
  - d. calling witnesses, including expert witnesses, to support its position, as may be appropriate in the circumstances of any hearing on the Application that may be ordered by the Public Utilities Board;
  - e. making representations and submissions, through counsel, to the Public Utilities Board concerning the disposition of the Application.

- f. The Intervenor will provide the Public Utilities Board a sense of submissions on matters affecting the Labrador Interconnected System and ratepayers therein as matters proceed.
4. If accepted as Intervenor, LWHN-NLH will provide the Public Utilities Board with substantive submissions only on matters affecting it as matters proceed and its participation would be limited to matters affecting ratepayers in the Labrador Interconnected System.
5. The LWHN-NLH is seeking the cost of its intervention, and such amount is to be determined.

Dated at Labrador City, in the Province of Newfoundland and Labrador, this 16 day of January, 2015.



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Edward M. Hearn, Q.C.

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AND TO: Vale Newfoundland and Labrador Limited  
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**AND TO:** Newfoundland Power Inc.  
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**AND TO:** Consumer Advocate  
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**AND TO:** Yvonne Jones, MP Labrador  
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**AND TO:** Innu Nation  
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**AND TO:** Corner Brook Pulp and Paper Limited,  
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