



Newfoundland Power Inc.

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HAND DELIVERED

August 26, 2013

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

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

Ladies and Gentlemen:

Re: Newfoundland and Labrador Hydro's 2013 General Rate Application

Please find enclosed the original and 12 copies of Newfoundland Power's Intervenor's Submission in relation to the above-noted Application.

For convenience, the Intervenor's Submission is provided on three-hole punched paper.

A copy of this letter, together with enclosures, has been forwarded directly to the parties listed below.

If you have any questions regarding the enclosed, please contact the undersigned at your convenience.

Yours very truly,

Gerard M. Hayes
Senior Counsel

Enclosures



c. Geoffrey Young
Newfoundland and Labrador Hydro

Paul Coxworthy
Stewart McKelvey

Thomas O'Reilly, QC
Vale Newfoundland & Labrador Limited

Thomas Johnson
O'Dea Earle Law Offices

Dean A. Porter
Poole Althouse



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

IN THE MATTER OF a General Rate Application
(the Application) by Newfoundland and Labrador Hydro
for approvals of, under Section 70 of the Act, changes
in the rates to be charged for the supply of power and
energy to Newfoundland Power, Rural Customers and
Industrial Customers; and under Section 71 of the Act,
changes in the Rules and Regulations applicable to the
supply of electricity to Rural Customers.

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

INTERVENOR’S SUBMISSION

A. General

1. Newfoundland Power Inc. (“Newfoundland Power”) wishes to intervene in the Application.

B. Interest of Newfoundland Power

2. Newfoundland Power purchases approximately 85% of Newfoundland and Labrador Hydro’s (“Hydro”) annual production of electrical energy on the Island of Newfoundland for resale to consumers. Electrical energy purchased from Hydro for resale is Newfoundland Power’s largest single expense totaling approximately \$380 million in 2012. The Application requests, amongst other things, that the Board approve changes to Hydro’s customer rates that will affect the price of electrical energy for Newfoundland Power’s customers.
3. As Hydro’s largest customer, Newfoundland Power’s interest in the Application includes, without limitation, an interest in ensuring that the rates to be charged for electricity and the rules and regulations governing the provision of electrical service are just and reasonable in accordance with the provisions of the *Act*, the *Electrical Power Control Act, 1994*; the *Hydro Corporation Act* and all regulations made pursuant thereto.

C. Disposition Advocated by Newfoundland Power

4. Until Newfoundland Power has had an opportunity to gain a satisfactory understanding of the matters to be considered in the Application, Newfoundland Power will not be in a position to advocate a specific disposition of the Application.

D. Facts and Reasons Supporting Intervention

5. Until Newfoundland Power has had an opportunity to gain a satisfactory understanding of the matters to be considered in the Application, Newfoundland Power will not be in a position to submit what facts it intends to show in evidence or for what reasons the Board should dispose of the Application of Hydro in a particular manner.

E. Participation of Newfoundland Power

6. Newfoundland Power proposes to fully participate in the hearing of the Application and the various procedures associated with the Application including, without limitation:
- (a) directing information requests to Hydro as may be permitted by the Board;
 - (b) participating in technical conferences or similar processes mandated by the Board;
 - (c) cross-examining of witnesses appearing on behalf of Hydro or any other party;
 - (d) calling of witnesses, including expert witnesses, as is appropriate in the circumstances; and
 - (e) making representations through counsel to the Board concerning the disposition of the Application.

DATED at St. John's, Newfoundland and Labrador this 26th day of August, 2013.

NEWFOUNDLAND POWER INC.



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