

IN THE MATTER OF the *Electrical Power Control Act*, RSNL 1994, Chapter E-5.1 (the "EPCA") and the *Public Utilities Act*, RSNL 1990, Chapter P-47 (the "Act") as amended, and their subordinate regulations; and

IN THE MATTER OF an Application by Newfoundland and Labrador Hydro pursuant to Subsection 41(3) of the Act, for the approval to upgrade Unit 1 stack breeching and to upgrade the fuel oil storage facility at the Holyrood Thermal Generation Station.

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

INTERVENOR'S SUBMISSION

General

1. The Consumer Advocate wishes to intervene in the proposed 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 and Labrador Hydro'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.

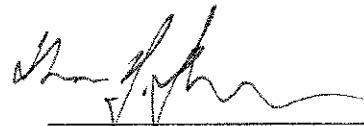
Facts and Reasons Supporting Intervention

4. The Consumer Advocate repeats the foregoing paragraph and state that there has not yet been sufficient opportunity for the Consumer Advocate 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 any 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 submissions to the Board concerning the disposition of the Application.

DATED at St. John's, in the Province of Newfoundland and Labrador, this 31 day of July, 2011.



THE CONSUMER ADVOCATE

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