1	In Th	e Matter Of the Public Utilities	
2	Act, R.S.N.L. 1990, Chapter P-47		
3	(the "	Act") and the Electrical Power	
4	Contro	ol Act, R.S.N.L. 1994, Chapter E-5.1	
5	(the "l	EPCA") and;	
6			
7	In The Matter Of a General Rate		
8	Application (the "Application") by		
9	Newfoundland and Labrador Hydro		
10	(the "	Applicant") dated July 30, 2013 and	
11	Amended on November 10, 2014 (the		
12	"Ame	nded Application")	
13			
14			
15	TO:	The Board of Commissioners of Public Utilities (the Board)	
16			
17	RE:	Newfoundland and Labrador Hydro's 2015 Interim Rates Applications and the	
18		Intervention of the Towns of Labrador City, Wabush, Happy Valley-Goose Bay and	
19		North West River (the "LWHN Intervenor").	
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21			
22		FINAL SUBMISSION OF THE INTERVENOR	
23			
24	1.	On January 16, 2015, the Towns of Labrador City, Wabush, Happy Valley-Goose	
25		Bay, and North West River (hereinafter "LWHN Intervenors") made a submission	
26		to the Board of Commissioners of Public Utilities (the "Board") in which the	
27		LWHN Intervenor advocated that July 30, 2013 Application and Amended on	
28		November 10, 2014, be disposed of as follows:	
29			

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.

2. On October 5, 2015, James P. Feehan, Ph.D., an economist testified as to his filed **Report on the Allocation of the Rural Deficit** (the "Report"), prepared for the law firm of Miller & Hearn who were representing the LWHN Intervenors. That April 20, 2014, filed Report was the subject of Dr. Feehan's evidence and testimony on October 5, 2015, which testimony stated in part:

"... the rural deficit is disproportionately borne by customers on the Labrador interconnected system, and that the paper essentially starts by looking at how that is, and I really focus on two things. If we look at it on a pre megawatt hour basis, the total dollars allocated to those customers versus Newfoundland Power's retail customers, we find that people in the Labrador system pay more per megawatt hour. Even more insightful, I think, is when you look at it on a per customer basis and we saw at least for the figures given in the original 2013 general rate application, the Labrador interconnected customers would be paying something like \$660.00 each on the average towards the rural deficit, whereas Newfoundland Power's customers would be paying something like \$220.00 each on the average. So that's a very substantial difference not only in dollar terms, but certainly in percentage terms.

59	3.	Based on the Report, the evidence, the Intervenor's Submissions, and basic
60		fairness for ratepayers in the Labrador interconnected system, the LWHN
61		Intervenor requests that the Board accept the allocation methodology as proposed
62		in the Amended Application.
63		
64	4.	The LWHN Intervenor is seeking the cost of its intervention, and such amount is
65		to be determined.
66		D
67	DAT	<u>ΓΕD</u> at St. John's, Newfoundland and Labrador, this <u>25</u> day of December, 2015.
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69		
70		Down Group
71		Dennis Browne, Q.C.
72		Solicitor for the Intervenor,
72 73		
		Solicitor for the Intervenor,
73		Solicitor for the Intervenor, The Towns of Labrador City, Wabush,
73 74		Solicitor for the Intervenor, The Towns of Labrador City, Wabush, Happy Valley-Goose Bay, and North West River