

HAND DELIVERED

August 12, 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: An Application by Newfoundland and Labrador Hydro pursuant to Section 70(1) and 76 of the Act for approval of the Rate Stabilization Plan rules and components of the rates to be charged to Industrial Customers.

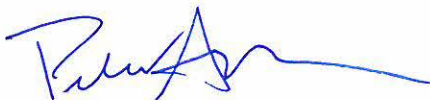
Please find enclosed the original and 12 copies of Newfoundland Power's (i) Intervenor's Submission and (ii) Requests for Information NP-NLH-1 to NP-NLH-11 in relation to the above-noted Application.

For convenience, the Intervenor's Submission and Requests for Information are 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,



Peter Alteen
Vice President
Regulation & Planning

Enclosures



c. Geoffrey Young
Newfoundland and Labrador Hydro

Paul Coxworthy
Stewart McKelvey

Greg Moores
Stewart McKelvey

Mark Sheppard
Vale Newfoundland & Labrador Limited

Thomas Johnson
O'Dea Earle Law Offices

Dean A. Porter
Poole Althouse

Sheryl Nisenbaum
Praxair Canada Inc.



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”), and regulations thereunder;

IN THE MATTER OF an Application by Newfoundland and Labrador Hydro for the approval, pursuant to Sections 70(1) and 76 of the Act, of the Rate Stabilization Plan rules and components of the rates to be charged to Industrial Customers (the “Application”).

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 (“Newfoundland Hydro”) annual production of electrical energy on the Island of Newfoundland for resale to consumers. Electrical energy purchased from Newfoundland 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 Rate Stabilization Plan rates and components that will affect the price of electrical energy for Newfoundland Power’s customers.
3. As Newfoundland 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 Newfoundland Hydro in a particular matter.

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 Newfoundland 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 Newfoundland 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 this 12th day of August, 2013.

NEWFOUNDLAND POWER INC.



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