

HAND DELIVERED

April 28, 2014

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: Application pursuant to section 41(3) of the Public Utilities Act for the Approval of a Capital Project to Supply and Install 100 MW (Nominal) of Combustion Turbine Generation**

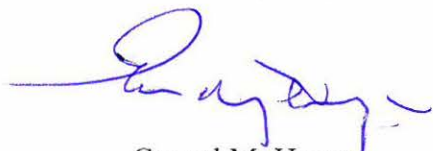
Please find enclosed the original and 12 copies of Newfoundland Power's Intervenor's Submission in relation to the above-noted Application.

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

Dean A. Porter  
Poole Althouse

Thomas Johnson  
O'Dea Earle Law Offices

Thomas O'Reilly, QC  
Vale Newfoundland and Labrador Limited

Sheryl Nisenbaum  
Praxair Canada Inc.



**IN THE MATTER OF** the *Electrical Power Control Act*\_ R.S.N.L. 1994, Chapter E-5.1 (the *EPCA*) and the *Public Utilities Act*, R.S.N.L. 1990, Chapter P-47 (the *Act*), and regulations thereunder;

**AND IN THE MATTER OF** an Application by Newfoundland and Labrador Hydro (Hydro) pursuant to Subsection 41(3) of the *Act*, for approval of the procurement and installation of a combustion turbine at Holyrood.

**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, and distributes electricity to the vast majority of customers served by the Island Interconnected System. The Application requests that the Board approve capital expenditures related to the installation of a combustion turbine for purposes of increasing the reliability of generating capacity on the Island Interconnected System. Approval of the Application 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 electrical service provided by Hydro on the Island Interconnected System is reliable, and that the rates to be charged by Hydro for electricity 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.

**DATED** at St. John's, Newfoundland this 28<sup>th</sup> day of April, 2014.

**NEWFOUNDLAND POWER INC.**

Ian Kelly, Q.C. and Gerard Hayes  
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