



April 22, 2014

Ms. G. Cheryl Blundon
Board of Commissioners of Public Utilities
120 Torbay Road, P.O. Box 12040
St. John's, NL A1A 5B2

Ladies & Gentlemen:

Re: Application by Newfoundland and Labrador Hydro pursuant to Section 41(3) of the Act for approval of the procurement and installation of a combustion turbine at Holyrood

In relation to the above noted Application, please find enclosed the Intevenor's Submission of the Consumer Advocate.

We trust this is found to be in order.

Yours very truly,

O'DEA, EARLE

A handwritten signature in black ink, appearing to read 'Thomas Johnson', is written over the printed name.

THOMAS JOHNSON

TJ/cel

cc: Newfoundland and Labrador Hydro
Attention: Geoffrey P. Young

Newfoundland Power
Attention: Gerard Hayes

Island Industrial Customers Group
Attention: Mr. Paul Coxworthy (Stewart McKelvey)

Vale Newfoundland and Labrador Limited
Attention: Mr. Thomas O'Reilly, Q.C. (Cox & Palmer)

Praxair Canada Inc.
Attention: Ms. Sheryl Nisenbaum

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

AND IN THE MATTER OF an Application by Newfoundland and Labrador Hydro (Hydro) pursuant to Section 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

General

1. The Consumer Advocate wishes to intervene in the 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 procurement and installation of a new combustion turbine at Holyrood.

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 reason for the Consumer Advocate's intervention is to receive and consider materials filed in support of the Application so as to be in a position to assess whether the record before the Board indicates that Newfoundland and Labrador Hydro's proposed expenditure for Holyrood is reasonably necessary for Hydro to meet its obligations to provide electrical service as required by the *Act*.

Participation of the Consumer Advocate

5. In light of the Consumer Advocate's ongoing review of the Application, the Consumer

Advocate cannot state at this time whether or not he shall present evidence in relation to the Application. The Consumer Advocate may wish to participate in technical conferences, file requests for information and to avail of the right to cross-examine witnesses or to submit argument at a public hearing of the Application, all as the circumstances may require.

DATED at St. John's, in the Province of Newfoundland and Labrador, this 22nd day of April, 2014.



THE CONSUMER ADVOCATE

Thomas Johnson, LL.B.

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