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October 16, 2014

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Via Electronic Mail and Courier

Newfoundland and Labrador Board
of Commissioners of Public Utilities
120 Torbay Road
P.O. Box 21040
St. John's, NL A1A 5B2

**Attention: Ms. G. Cheryl Blundon, Director of Corporate Services
and Board Secretary**

Dear Ms. Blundon:

**Re: Newfoundland and Labrador Hydro - Application for Approval of the Deferral and
Recovery of Expenses Associated with the Increased Capacity-Related Supply
Costs on the Island Interconnected System in 2014**

Please find enclosed the original and twelve (12) copies of the Intervenor's Submission of the
Island Industrial Customers Group in respect of the above Application.

We trust you will find the above and enclosed to be in order.

Yours truly,

Stewart McKelvey

Paul L. Coxworthy

PLC/kmcd

- c. Mr. Geoffrey P. Young, Senior Legal Counsel, Newfoundland and Labrador Hydro
Mr. Thomas J. Johnson, Q.C., Consumer Advocate
Mr. Gerard Hayes, Newfoundland Power
Mr. Thomas J. O'Reilly Q.C.
Mr. Dean A. Porter, Poole Althouse
Ms. Sheryl Nisenbaum, Praxair

IN THE MATTER OF the *Electrical Power Control Act*, 1994, 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, pursuant to Sections 78 and 80 of the Act, for the approval of the deferral and recovery of expenses associated with the increased capacity-related supply costs on the Island Interconnected System in 2014.

To: The Board of Commissioners of Public Utilities

INTERVENORS' SUBMISSION OF THE ISLAND INDUSTRIAL CUSTOMERS GROUP

TAKE NOTICE that **Corner Brook Pulp and Paper Limited, North Atlantic Refining Limited, and Teck Resources Limited (the "Island Industrial Customers Group")**, through their solicitors Stewart McKelvey and Poole Althouse, hereby give notice of their intention to participate in the within Application, in their respective positions as Island Industrial Customers of the Applicant Newfoundland and Labrador Hydro (the "Applicant") which are affected by the rates charged by the Applicant.

Interest of the Island Industrial Customers Group

1. Each of the members of Island Industrial Customers Group presently own and operate on the Island of Newfoundland substantial industrial operations, each of which is a major consumer of power purchased from the Applicant.

Disposition Sought by the Island Industrial Customers Group

2. Given the recent filing of the Application, and the various matters raised by the Application and to be addressed by Requests for Information and by other pre-hearing

and hearing processes, the Island Industrial Customers Group does not yet have sufficient information, and have not yet had sufficient opportunity, to formulate particular dispositions with respect to the various approvals sought by the Applicant.

Facts and Reasons Supporting Intervention

3. The Island Industrial Customers Group repeat the foregoing paragraph and state that there has not yet been sufficient opportunity for the Island Industrial Customers Group to submit what facts they intend 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 Island Industrial Customers Group

4. The Island Industrial Customers Group 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 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, through counsel, to the Board concerning the disposition of the Application, including for the award of costs to the Island Industrial Customers Group in respect of their intervention and participation in the Application.

Documents relating to this hearing can be served on the Island Industrial Customers Group in care of:

Mr. Paul L. Coxworthy
Stewart McKelvey
Suite 1100, Cabot Place
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P.O. Box 5038
St. John's, NL A1C 5V3

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E-mail: pcoxworthy@stewartmckelvey.com

AND

Mr. Dean A. Porter
Poole Althouse
Western Trust Building
49-51 Park Street
P.O. Box 812
Comer Brook, NL A2H 2X1

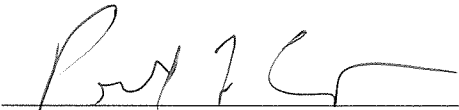
Telephone: (709) 637-6425
Telecopier: (709) 634-8247

E-mail: dporter@pa-law.ca

DATED at St. John's, Newfoundland and Labrador, this 16th day of October, 2014.

POOLE ALTHOUSE

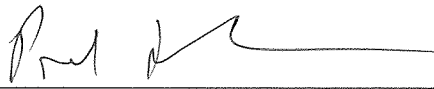
Per:



Dean A. Porter

STEWART MCKELVEY

Per:



Paul L. Coxworthy

TO: The Board of Commissioners of Public Utilities
Suite E210, Prince Charles Building
120 Torbay Road
P.O. Box 21040
St. John's, NL A1A 5B2
Attention: Board Secretary

TO: Newfoundland & Labrador Hydro
P.O. Box 12400
500 Columbus Drive
St. John's, NL A1B 4K7
Attention: Mr. Geoffrey P. Young
Senior Legal Counsel

TO: Thomas Johnson, Q.C.
Consumer Advocate
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TO: Newfoundland Power Inc.
P.O. Box 8910
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St. John's, NL A1B 3P6
Attention: Mr. Gerard Hayes
Senior Counsel

TO: Praxair Canada Inc.
1 City Centre Drive, Suite 1200
Mississauga ON M5E 1M2
Attention: Sheryl Nisenbaum