

October 16, 2014

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

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

Ladies & Gentlemen:

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**

Further to this Application, enclosed please find the original and 12 copies of:

1. Newfoundland Power's Intervenor's Submission; and
2. Requests for Information NP-NLH-001 to NP-NLH-021.

We trust the foregoing is found to be in order.

Yours very truly,



Peter Alteen, QC
Vice President
Regulation & Planning

Enclosures

c. Geoffrey Young
Newfoundland and Labrador Hydro

Thomas Johnson
O'Dea Earle Law Offices

Sheryl Nisenbaum
Praxair Canada Inc.

Paul Coxworthy
Stewart McKelvey Stirling Scales

Thomas O'Reilly, QC
Vale Newfoundland and Labrador Ltd.



IN THE MATTER OF the Public
Utilities Act, R.S.N. 1990, Chapter P-47
(the Act), and

AND IN THE MATTER OF an Application
by Newfoundland and Labrador Hydro,
pursuant to Sections 78 and 80 of the *Act*,
for approval of the deferral and recovery of
expenses associated with the increased
capacity-related supply costs on the Island
Interconnected System in 2014 (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. Over 85% of Newfoundland and Labrador Hydro’s (“Hydro”) annual production of electrical energy on the Island of Newfoundland is purchased by Newfoundland Power for resale to its customers. The relief requested by Hydro in the Application would, if granted by the Board, be substantially recovered from customers of Newfoundland Power.
3. As Hydro’s largest customer, Newfoundland Power’s interest in the Application includes, without limitation, an interest in ensuring that the costs recovered 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 may wish 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 Application and the various procedures associated with the Application including, without limitation:
 - (a) directing information requests to 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 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 and Labrador this 16th day of October, 2014.

NEWFOUNDLAND POWER INC.

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