File No.



NEWFOUNDLAND AND LABRADOR HYDRO

Head Office: St. John's, Newloundiand P.O. Box 12400; A18:4K7 Telephone (709):737-1400 • Fax (709):737-1231 • Website: www.nlh.nl; ca

BY HAND

June 8, 2007

Board of Commissioners of Public Utilities Prince Charles Building 120 Torbay Road St. John's, Newfoundland & Labrador A1A 5B2

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

Dear Ms. Blundon:

Re: Newfoundland Power - 2008 General Rate Application

Enclosed please find ten (10) copies of Newfoundland and Labrador Hydro's Intervenor's Submission with respect to the Newfoundland Power's 2008 General Rate Application.

Yours truly,

NEWFOUNDLAND AND LABRADOR HYDRO

Geoffrey P. Young Legal Counsel

Encl.

cc: Ian Kelly/Gerard Hayes, Counsel to Newfoundland Power Inc.

> Mr. Thomas J. Johnson Consumer Advocate

IN THE MATER OF the Public Utilities Act, R.S.N.L. 1990, Chapter P-47, as amended, (the "Act"); and

IN THE MATTER OF a general rate application (the Application) by Newfoundland Power Inc. (Newfoundland Power) to establish customer electricity rates for 2008.

TO: The Board of Commissioners of Public Utilities (the Board)

INTERVENOR'S SUBMISSION

- 1. Newfoundland and Labrador Hydro (Hydro) is a corporation continued and existing under the *Hydro Corporation Act*, is a public utility within the meaning of the Act and is subject to the provisions of the *Electrical Power Control Act*, 1994.
- The Applicant, Newfoundland Power, Hydro's largest customer and the primary distribution electrical utility on the Island of Newfoundland, purchases from Hydro approximately 90% of the energy that it sells to its customers.
- 3. Hydro's rates for sales to non-Industrial Island Interconnected customers and to its isolated customers are the same rates, or are based upon the rates, set by this Board for Newfoundland Power's customers.
- The regulatory principles used in ratemaking for Newfoundland Power are relevant to Hydro because many issues and principles apply equally to both utilities.
- 5. Hydro is not advocating any specific disposition of the Application at this time.

6. Hydro is requesting Intervenor status for the purpose of obtaining all information filed in the proceeding and so is proposing to participate in a limited fashion to file Requests for Information and to attend technical conferences. Should Hydro become aware of issues or information that require Hydro to participate in the proceeding in a more active capacity, Hydro will apply to the Board for leave to expand the scope of its intervention.

Dated at St. John's, in the Province of Newfoundland and Labrador, this <u>St</u> day of June, 2007.

Geoffrey P. Young

Solicitor for the Applicant, Newfoundland and Labrador Hydro, 500 Columbus Drive, P.O. Box 12400 St. John's, Newfoundland, A1B 4K7