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March 7, 2013

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

RE: AN ORDER OF THE BOARD NO. P.U. 3(2014)

An Investigation and Hearing into supply issues and power outages on the Island Interconnected system and the matter of the *Electrical Power Control Act*, 1994, Chapter E-5.1 (the "EPCA") and the *Public Utilities Act*, RSNL 1990, Chapter P-47 (the "Act") as amended:

Attention: Ms. Cheryl Blundon (for the Board)

Dear Ms. Blundon:

In the Board's recent Order referenced above, on page 3 among other statements, are the following :

Whereas the Board is satisfied that, to effectively assess adequacy and reliability of the Island Interconnected system, it is necessary to consider planned future changes to the system; and

Whereas the Board has considered the lists of issues, submissions, written comments and presentations and has determined that it is appropriate and necessary to address how Hydro and Newfoundland Power will ensure adequacy and reliability on the Island Interconnected system over the short, medium and long-term, which will require analysis of the adequacy and reliability of the system after the commissioning of the Muskrat Falls generating facility and the Labrador Island Link; and

Whereas the Board is satisfied that the process established for this matter should ensure a **comprehensive review with full opportunity for interested persons to participate** and should also ensure that measures necessary to prepare for the 2014-2016 winter seasons are addressed as soon as possible; (emphasis added).

Essentially, the scope of the Board's investigation has been expanded, since it's original inception, to include "long-term reliability" including a review after commissioning of the Muskrat Falls generating Facility and the Labrador Island Link.

Grand Riverkeeper Labrador, Inc. believes the PUB ought to provide a renewed opportunity for members of the general public to apply as interveners. This is the most meaningful way "full opportunity for interested persons to participate", in the Board's words, can be achieved.

We note that the Board intends to permit additional Presentations by members of the public which is also welcomed. But the issue of security and supply in the post-Muskrat Falls period implies the requirement for consideration of a far broader range of issues.

They reflect a need for the expertise of those who have studied matters such as the Energy Access Agreement with Emera, the Labrador Transmission Link and the Water Management Agreement. As it stands, we risk having these issues debated by those whose greater expertise is limited to issues of Holyrood and related assets. Therefore, we feel the need to re-open the process of application for intervener status is compelling!

Thus, even though we realize the "original" application period has passed, Grand Riverkeeper Labrador, Inc. is, at this time, requesting status as an intervener in this process as we feel we can provide expertise relating to the issues mentioned above.

We have taken note that in his comments to the PUB one of the pre-hearing participants, Mr. Desmond Sullivan, also requested that the Board re-open the opportunity for intervener status. We are aware of others who may now wish to participate in the process.

We therefore respectfully request that our out-of-time application for Intervener status be granted. We further ask the Board to re-open the application period to allow other interested parties to apply for standing.

We look forward to your decision on this matter.

Sincerely,

Roberta Frampton Benefiel, Vice President

Grand Riverkeeper Labrador, Inc.