



Senwung Luk
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March 3, 2020

Cheryl Blundon
Board Secretary
Board of Commissioners of Public Utilities
Prince Charles Building
210-120 Torbay Road
St. John's, NL A1A 2G8

Dear Ms. Blundon,

Re: Application for Intervention

Please find enclosed the application for intervention on behalf of the communities of Sheshatshiu, Happy Valley-Goose Bay, Wabush, and Labrador City (the "Labrador Interconnected Group"), in the Resource Reliability and Adequacy Study proceeding (the "RRAS").

We are aware that the application to participate in the RRAS was initially due on January 17, 2020, and that our submission is past the due date. However, at the time that the initial application was due, we had understood that the issue of potential integration of the Labrador Interconnected and Island Interconnected Systems had been dealt with and resolved for the time being in the recently decided Cost of Service Methodology proceeding. As such, we had determined that there may not have been a sufficient interest for the LIG to be participating in the RRAS proceeding.

However, in its recent Rate Mitigation Reference decision, dated February 7, 2020, the Board raised the topic anew in stating that there was a question about "these two systems should continue to be treated separately in the long-term".

As a result, the LIG is concerned with the extent to which the separate treatment of the two systems would arise in the RRAS, as well as other issues of import to LIG customers. As the Rate Mitigation decision of the Board could not have been known to the LIG as of January 17, we beg the Board's indulgence in accepting our application despite its delayed submission.

Sincerely,

A handwritten signature in black ink, appearing to read "Senwung Luk". The signature is fluid and cursive, with the first name "Senwung" written in a larger, more prominent script than the last name "Luk".

Senwung Luk

SL/as

**Board of Commissioners of Public Utilities
Newfoundland and Labrador**

Intervenor Submission Form

All information provided on this form will be placed on the public record for this proceeding

Reliability and Resource Adequacy Study Review

Intervenor Information

Name: Labrador Interconnected Group	Mailing Address: See attachment
Title:	City:
Organization:	Province:
Telephone:	Postal Code:
Facsimile:	Email:
Address for delivery (if different from mailing address): See legal counsel information below.	

Legal Counsel / Representative (if applicable)

Name: Senwung Luk	Mailing Address: 250 University Ave., 8th Floor
Title: Lawyer	City: Toronto
Organization: OKT Law	Province: Ontario
Telephone: 416-981-9330	Postal Code: M5H 3E5
Facsimile: 416 981 9350	Email: sluk@oktlaw.com
Address for delivery (if different from mailing address):	

Interest in the Proceeding

List the topics/issues you are interested in.

All matters affecting or potentially affecting:

- the Labrador Interconnected System;
- planning for power supply adequacy and reliability in Labrador; and
- the treatment of the Labrador Interconnected System and the Island Interconnected System as separate systems.

What facts or documentation will you rely on to support your intervention?

We anticipate relying on the documentation filed at the proceedings, including the application and the requests for information, as well as evidence produced by an expert witness. We are in the process of determining who is available to serve as an expert witness and will be able to advise the Board shortly on the identity of the expert we intend to retain.

How is your interest unique and not represented by others?

The Labrador Interconnected Group represents the domestic ratepayers of Sheshatshiu, Happy Valley-Goose Bay, Wabush, and Labrador City. These communities are all part of the Labrador Interconnected System. Although the Consumer Advocate represents the interests of all ratepayers, there may be times when the interests of Island consumers diverge from those on the Labrador Interconnected System. Moreover, the particular interests of certain Island consumers are likely to be represented by Newfoundland Power, which is also likely to seek standing. We propose to represent Labrador Interconnected System customers only where those diverge from the general interests of all ratepayers.

Participation in the Proceeding

Do you intend to:

- | | | |
|----------------------------------|---|-----------------------------|
| i. Appear throughout the hearing | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| ii. Submit written evidence | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| iii. Ask written questions | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| iv. File expert reports | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| v. Call witnesses | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| vi. Cross examine witnesses | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |
| vii. Present final submissions | <input checked="" type="checkbox"/> Yes | <input type="checkbox"/> No |

If you intend to call expert witness(es) provide the following information on a separate attachment for each witness: Name of witness, address, qualifications and subject/issue that will be addressed by the witness.

Signature

Date

Completed forms may be submitted by mail, courier, fax or email by January 17, 2020 at the addresses below:

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

Courier/Hand delivered
Board of Commissioners of Public Utilities
120 Torbay Road
Prince Charles Building, Suite E-210
St. John's, NL A1A 5B2

Facsimile/email
F: 709-726-9604
E: ito@pub.nl.ca

This is an attachment to the Application for Standing Form for the communities of Sheshatshiu, Happy Valley-Goose Bay, Wabush, and Labrador City, for the Rate Mitiation Reference. The contact information for each of these communities is as follows:

Intervener: Sheshatshiu Innu First Nation
Contact: Chief Eugene Hart
P.O. Box 160
Sheshatshiu, NL, A0P 1M0
Phone: (709) 497-8522
Email: ehart@sifn.ca

Intervener: Labrador City
Contact: Cathy Etsell, Town Manager
PO Box 280
317 Hudson Dr
Labrador City NL A2V 2K5
Phone: 709-944-2621
Email: townmanager@labradorcity.ca

Intervener: Wabush
Contact: Charlie Perry, Town Manager
PO Box 190
15 Whiteway Dr
Wabush NL A0R 1B0
Phone: 709-282-5696
Email: townmanager@wabush.ca

Intervener: Happy Valley-Goose Bay
Contact: Randy Dillon, Director of Engineering
212 Hamilton River Road
P.O. Box 40 Station B
Happy Valley-Goose Bay, NL A0P 1E0
Phone: (709) 896-8222
Fax: (709) 896-9454
Email: Eng@townhvgb.com