



OLTHUIS KLEER  
TOWNSHEND - LLP

BARRISTERS AND SOLICITORS

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September 1, 2020

**BY EMAIL**

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

**Re: Newfoundland and Labrador Hydro – 2021 Capital Budget Application**

Dear Ms. Blundon:

Please find enclosed the Labrador Interconnected Group's Intervenor Submission.

Copies of this correspondence and the Submission will be provided to the parties listed on the Submission.

Respectfully,  
Olthuis, Kleer, Townshend LLP  
PER:

A handwritten signature in black ink, appearing to read 'Julia Brown', written over a horizontal line.

JULIA BROWN  
LAWYER

JB/

**IN THE MATTER OF** the *Public Utilities Act*, (the “Act”); and

**IN THE MATTER OF** and Application by Newfoundland and Labrador Hydro (“Hydro”) for an Order approving: (i) its 2021 Capital Budget pursuant to s. 41(1) of the Act; (ii) its 2021 capital purchases and construction projects in excess of \$50,000.00 pursuant to s. 41(3)(a) of the Act; and (iii) for an Order pursuant to s. 78 of the Act fixing and determining its average rate base for 2017, 2018 and 2019

## **APPLICATION OF THE LABRADOR INTERCONNECTED GROUP**

### **THE APPLICATION OF THE LABRADOR INTERCONNECTED GROUP STATES:**

#### **Introduction**

1. The Labrador Interconnected Group (the “LIG”) jointly represents the communities of Sheshatshiu, Happy Valley-Goose Bay, Wabush, and Labrador City. The businesses and residents of these communities are ratepayers in the Labrador Interconnected System.
2. By way of this application, the Labrador Interconnected Group seeks to be recognized as an intervener in the above-noted application.

#### **Interest of the Labrador Interconnected Group**

3. The Labrador Interconnected Group, if accepted as an intervener, would be the only party representing the specific interests of Labrador domestic consumers in this proceeding. We propose to restrict our intervention only to projects that directly affect Labrador consumers.

### **Disposition sought by the Labrador Interconnected Group**

4. The Labrador Interconnected Group intends to take a position in the above-noted proceeding after reviewing the evidence disclosed during the proceeding.

### **Facts and Reasons Supporting Intervention**

5. The LIG intends on citing appropriate facts and reasons supporting our position after reviewing the evidence disclosed during the proceeding.

### **Participation of the Labrador Interconnected Group**

6. The LIG 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 LIG in respect of their intervention and participation in the Application.

7. Documents relating to this Application may be served on the Labrador Interconnected Group  
in care of:

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Olthuis Kleer Townshend LLP  
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Toronto, ON M5H3E5  
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DATED at Toronto, Ontario, this 1<sup>st</sup> day of September, 2020.

*OLTHUIS KLEER TOWNSHEND LLP*



Senwung Luk

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

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

TO: Newfoundland Power  
55 Kenmount Road  
St John's, NL A1B 3P6  
Attn: Gerard Hayes

TO: The Consumer Advocate  
Browne Fitzgerald Morgan & Avis  
Terrace on the Square, Level 2

PO Box 23135  
St John's, NL A1B 4J9  
Attn: Dennis Browne, QC

TO: Industrial Customer Group  
Stewart McKelvey Stirling Scales  
Cabot Place, 100 New Gower St  
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St John's, NL A1C 5V3  
Attn: Paul Coxworthy