

IN THE MATTER OF the *Public Utilities Act*, RSNL 1990, c P-47 (“Act”); and

IN THE MATTER OF an application by Newfoundland and Labrador Hydro (“Hydro”) for approval of: (i) its capital budget for 2024, pursuant to Section 41(1) of the Act, (ii) its proposed capital purchases and construction projects for 2024 in excess of \$750,000, pursuant to Section 41(3)(a) of the Act, and (iii) for an Order, pursuant to Section 78 of the Act, fixing and determining its average rate base for 2022.

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 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 to cite 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-examining 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; and
 - 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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DATED at Toronto, Ontario, this 3th day of August, 2023.

OLTHUIS KLEER TOWNSHEND LLP



Senwung Luk

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