



STEWART MCKELVEY STIRLING SCALES

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February 3, 2006

Via Courier

Ms. Cheryl Blundon, Board Secretary
Newfoundland and Labrador Board of
Commission of Public Utilities
Prince Charles Building
120 Torbay Road, P.O. Box 9188
St. John's, NL A1A 2X9

50/2006

Dear Ms. Blundon:

**Re: Application for Approval of Recovery of Costs of
1% Sulphur Fuel through the Rate Stabilization Plan**

We enclose herewith eight (8) copies of the Intervenor's Submission for filing with the Board.

We trust this is in order.

Yours very truly,

Stewart McKelvey Stirling Scales

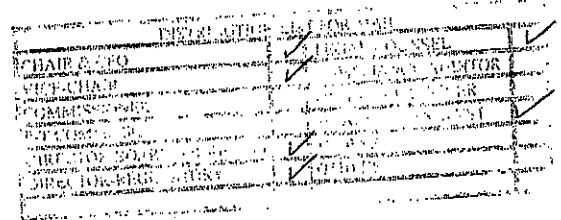
Margaret M. Dillio

for Colm St. Roch Seviour

CSRS/pfb

Enclosure

cc: Wayne D. Chamberlain
Peter Alteen



IN THE MATTER OF the *Public Utilities Act*
(the "Act") and

AND IN THE MATTER OF an application
Newfoundland and Labrador Hydro for the approval
pursuant to Section 71 of the Act, of the cost of Low
Sulphur Fuel as a fuel cost component to be recovered
through the Rate Stabilization Plan charged to
Newfoundland Power Inc. and the Island Industrial
Customers

INTERVENORS' SUBMISSION

TAKE NOTICE that Corner Brook Pulp and Paper Limited, North Atlantic Refining Limited, Abitibi-Consolidated Company of Canada, Stephenville and Grand Falls Divisions and Aur Resources Limited, through their solicitors, Stewart McKelvey Stirling Scales and Poole Althouse, hereby intervene as the Island Industrial Customers of Newfoundland and Labrador Hydro who are affected by the rates charged by Newfoundland and Labrador Hydro.

The Intervenors submit that the cost proposed to be recovered in this Application is not a reasonable and prudent cost of the supply of power and energy by Hydro, that the supporting material filed does not demonstrate the proposal to be the least cost alternative for the supply of power and energy and that no case is made for incurring these costs at this time in light of the current regulatory scheme affecting environmental protection, nor is it shown that the incurring of such costs will avoid the necessity of incurring additional large capital costs to address the same issues.

The Intervenor intend to participate by way of filing Information Requests, attendance at the hearing and cross-examination of witnesses, and reserves the right to call such expert or other evidence as may appear necessary upon receipt of responses to Information Requests.

Documents relating to this hearing can be served on the Intervenor in care of:

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AND


Joseph S. Hutchings, Q.C.
Poole Althouse
49-51 Park Street
P.O. Box 812
Corner Brook, NL
A2H 6H7

Direct: (709) 637-6425
Telecopier: (709) 634-8247

E-mail: jhutchings@pa-law.ca

DATED at St. John's, this 3rd day of February, 2006.

STEWART MCKELVEY STIRLING SCALES

Per: 
Colm Seviour

POOLE ALTHOUSE

Per: _____
Joseph S. Hutchings, Q.C.

TO: The Board of Commissioners of Public Utilities
Prince Charles Building
P.O. Box 9188
St. John's, NL
A1A 2X9

TO: Newfoundland and Labrador Hydro
Columbus Drive
P.O. Box 9100
St. John's, NL
A1A 2X8

Attention: Wayne D. Chamberlain

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

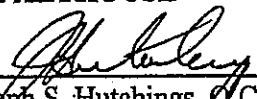
Attention: Peter Alteen

DATED at St. John's, this 3rd day of February, 2006.

STEWART MCKELVEY STIRLING SCALES

Per: _____
Colm Seviour

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