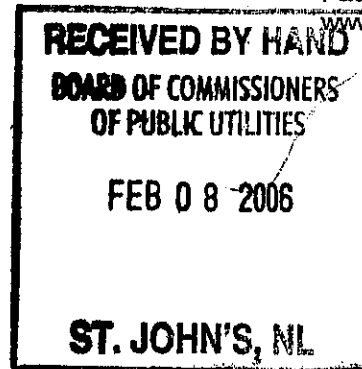


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HAND DELIVERED

February 8, 2006

Board of Commissioners
of Public Utilities
P.O. Box 21040
St. John's, NL A1A 2X9



Attention: G. Cheryl Blundon
Board Secretary

Ladies and Gentlemen:

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

Please find enclosed 15 copies of an Intervenor's Submission in relation to the above noted Application.

We trust this satisfactory.

Yours very truly,

Gerard Hayes
Senior Counsel

Enclosures

c. Wayne D. Chamberlain
Newfoundland and Labrador Hydro

Colm St. Roch Seviour
Stewart McKelvey Stirling Scales

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

IN THE MATTER OF an Application by 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

TO: The Board of Commissioners of Public Utilities (“the Board”)

INTERVENOR’S SUBMISSION

1. Newfoundland Power Inc. (“Newfoundland Power”) wishes to intervene in the Application.

Interests of Newfoundland Power

2. Newfoundland Power purchases approximately 70% of Newfoundland and Labrador Hydro’s (“Hydro”) annual production of electrical energy on the island of Newfoundland and therefore has an interest in Hydro’s costs proposed to be recovered through the Rate Stabilization Plan.

Disposition Advocated by Newfoundland Power

3. The disposition of the proceedings advocated by Newfoundland Power is that the Board is empowered pursuant to the Act to approve, and should approve, such prudent operating expenses as are reasonably necessary for Hydro to meet its obligations to provide electrical service as required by the Act.


Facts and Reasons Supporting Intervention

4. The reason for Newfoundland Power’s intervention is to receive materials filed in the proceeding so as to be in a position to consider whether those materials disclose any reason for more active participation by Newfoundland Power in respect of the Application.

Participation of Newfoundland Power

5. Newfoundland Power does not intend to present any evidence in relation to the Application. However, Newfoundland Power may wish to file requests for information as provided by the *Board of Commissioners of Public Utilities Regulations, 1996*, and to avail of the right to cross-examine witnesses or to submit argument at a public hearing of the Application, all as the circumstances may require.

DATED at St. John's, Newfoundland this 8th day of February, 2006.



Peter Alteen & Gerard Hayes
Counsel for the Applicant

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