

HAND DELIVERED

July 8, 2009

Board of Commissioners of Public Utilities
P.O. Box 21040
120 Torbay Road
St. John's, NF A1A 5B2

Attention: G. Cheryl Blundon
Director of Corporate Services
and Board Secretary

Ladies & Gentlemen:

**Re: Newfoundland and Labrador Hydro
Application Concerning the Rate Stabilization Plan Components of the Rates to be
Charged to Industrial Customers**

Enclosed are one original and eight copies of Newfoundland Power's Intervenor's Submission in respect of the above noted Application.

We trust the foregoing is found to be in order.

Yours very truly,



Gerard M. Hayes
Senior Counsel

c. Geoffrey Young
Newfoundland & Labrador Hydro

Thomas Johnson
O'Dea Earle Law Offices

Joseph Hutchings, Q.C.
Poole Althouse

Paul Coxworthy
Stewart McKelvey



Join us in the fight against cancer.

IN THE MATTER OF the Public
Utilities Act, R .S.N. 1990, Chapter P-47
(the "Act"), and

IN THE MATTER OF an Application
by Newfoundland and Labrador Hydro for the
approval, pursuant to Section 70 (1) and 76 of
the Act, of the Rate Stabilization Plan components
of the rates to be charged to Industrial Customers.

TO: The Board of Commissioners of Public Utilities ("the Board")

INTERVENOR'S SUBMISSION

A. General

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

B. Interest of Newfoundland Power

2. As Newfoundland and Labrador Hydro's ("Hydro") largest customer, Newfoundland Power's interest in the Application includes, without limitation, an interest in ensuring that the rates to be charged for electricity and the rules and regulations governing the provision of electrical service are just and reasonable in accordance with the provisions of the Act, the *Electrical Power Control Act, 1994*; the *Hydro Corporation Act* and all regulations made pursuant thereto.

C. Disposition Advocated by Newfoundland Power

3. Until Newfoundland Power has had an opportunity to gain a satisfactory understanding of the matters to be considered in the Application, it would be inappropriate for Newfoundland Power to advocate a specific disposition of the Application.

D. Facts and Reasons Supporting Intervention

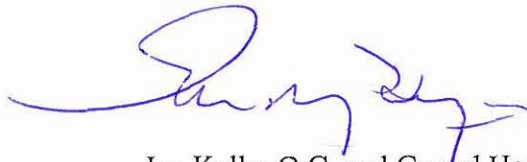
4. Until Newfoundland Power has had an opportunity to gain a satisfactory understanding of the matters to be considered in the Application, it would be premature for Newfoundland Power to decide what facts it intends to show in evidence or for what reasons the Board should dispose of the Application in a particular manner.

E. Participation of Newfoundland Power

5. Once Newfoundland Power has had an opportunity to gain a satisfactory understanding of the matters to be considered in the Application, it may choose to fully participate in the hearing of the Application and the various procedures associated with the hearing of the Application including, without limitation:
- (a) directing information requests to Hydro as may be permitted by the Board;
 - (b) cross-examining of witnesses appearing on behalf of Hydro or any other party;
 - (c) calling of witnesses, including expert witnesses, as is appropriate in the circumstances; and
 - (d) making representations through counsel to the Board concerning the disposition of the Application.

DATED at St. John's, Newfoundland this 8th day of July, 2009.

NEWFOUNDLAND POWER INC.



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