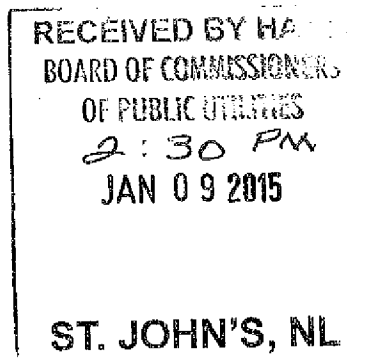




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January 9, 2015

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

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

Dear Ms. Blundon:

**RE: Newfoundland and Labrador Hydro – Application for Approval of the
Deferral and Recovery of Expenses Associated with the Increased Capacity
Related Supply Costs on the Island Interconnected System in 2014**

Please find enclosed the original and twelve (12) copies of the Intervenor's Submission
of the Nunatsiavut Government in respect of the above Application.

Should you have any questions or concerns please contact the undersigned.

Yours truly,

Benson Buffett PLC Inc.

GENEVIEVE M. DAWSON
GMD/sfp
Encl.

CHAIR & CEO	✓	FINANCIAL CONTROLLER	✓
VICE-CHAIR	✓	COMPLIANCE AUDITOR	✓
COMMISSIONER	✓	FINANCIAL OFFICER	✓
PAF COMMISSIONERS	✓	FINANCIAL ANALYST	✓
DIRECTOR-BOARD SECRETARY	✓	IT OFFICER	✓
DIRECTOR-REGULATORY	✓	OTHERS	✓
RA	MM	ROY	ME

In the Matter of the *Public Utilities Act* R.S.N.L. 1990, Chapter P-47, (the "Act") and the *Electrical Power Control Act*, R.S.N.L. 1994, Chapter E-5.1, (the "EPCA") and;

In the Matter of a General Rate Application (the "Application") by Newfoundland and Labrador Hydro (the Applicant") dated July 30, 2013 and amended on November 10, 2014

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

INTERVENOR'S SUBMISSION OF THE
NUNATSIAVUT GOVERNMENT

A. General

1. Pursuant to the *Public Utilities Act* and section 9 of the *Board of Commissioners of Public Utilities Regulations, 1996* the Nunatsiavut Government hereby gives notice of its intention to participate in the General Rate Application of Newfoundland and Labrador Hydro.

B. Interest of the Nunatsiavut Government

2. The Nunatsiavut Government is an Inuit regional government. Although Nunatsiavut remains part of Newfoundland and Labrador, the Nunatsiavut Government has authority over many central governance areas including health, education, culture, and language, justice, and Inuit Lands.
3. There are approximately 2500 Inuit residents who live in five (5) Inuit communities of Northern Labrador, which are; Nain, Hopedale, Postville, Makkovik, and Rigolet.
4. The above noted communities are remote and the cost of electricity is already prohibitive.
5. Constituents, both resident and commercial, of the Nunatsiavut Government are consumers of power purchased from the Applicant. These constituents of the Nunatsiavut Government will be significantly affected by the rates charged by the Applicant.

C. Disposition Advocated by the Nunatsiavut Government

6. As the Application was recently filed and many matters and questions will be addressed in the Request for Information process and hearing process, the Nunatsiavut Government has not yet had an opportunity to gain an adequate understanding of the matters to be considered in the Application. As such the Nunatsiavut Government does not yet have sufficient information to determine what disposition it will advocate for with respect to the Application.
7. Notwithstanding the foregoing, one of the fundamental principles of the Nunatsiavut Government is the pursuit of a sustainable economy for the Inuit. Further, any rate increase must be based on fairness to the Inuit.

D. Facts and Reasons Supporting Intervention

8. As stated above at paragraph 5, the Nunatsiavut Government has not yet had sufficient time and does not yet have sufficient information to determine what facts it intends to show in evidence or what reasons it intends to put forward to the Public Utilities Board to support the disposition it will advocate.

E. Participation of Nunatsiavut Government

9. The Nunatsiavut Government intends to participate in the various procedures associated with the Application including without limitation:
 - a. making Request 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 ordering by the Public Utilities Board;
 - d. calling witnesses, including expert witnesses, to support its position, as may be appropriate in the circumstances of any hearing on the Application that may be ordered by the Public Utilities Board;

- e. making representations and submissions, through counsel, to the Public Utilities Board concerning the disposition of the Application.
- 10. If accepted as Intervenor, the Nunatsiavut Government will provide the Public Utilities Board with substantive submissions on the Application as matters proceed.
- 11. The Nunatsiavut Government is seeking the cost of its intervention, and such amount is to be determined.

Dated at St. John's, Province of Newfoundland and Labrador the 4th of January, 2015.



GENEVIEVE DAWSON

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Nunatsiavut Government
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TO: **Vale Newfoundland and Labrador Limited**
Mr. Thomas O'Reilly, Q.C.
Cox & Palmer
Scotia Centre, Suite 1000
235 Water Street
St. John's, NL A1C 1B6

AND TO: **Towns of Labrador City, Wabush,
Happy Valley-Goose Bay and North West River**
Mr. Edward Hearn, Q.C.
Miller & Hearn
450 Avalon Drive
P.O. Box 129
Labrador City, NL A2V 2K3

AND TO: **Newfoundland Power Inc.**
Mr. Gerard Hayes
Newfoundland Power Inc.
55 Kenmount Road
P.O. Box 8910
St. John's, NL A1B 3P6

AND TO: **Consumer Advocate**
Mr. Thomas Johnson
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AND TO: **Yvonne Jones, MP Labrador**
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AND TO: **Innu Nation**
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AND TO: **Corner Brook Pulp and Paper Limited,
North Atlantic Refining Limited and
Teck Resources**
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