

IN THE MATTER OF the *Electrical Power Control Act*, RSNL 1994, Chapter E-5.1(the "EPCA" and the *Public Utilities Act*, RSNL 1990, Chapter P-47 (the "Act"), and regulations thereunder;

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

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

INTERVENOR'S SUBMISSION

A. General

1. The Consumer Advocate wishes to intervene in the Application.

B. Interest of the Consumer Advocate

2. The Application requests, amongst other things, that the Board approve changes to Rate Stabilization Plan rates and components that will affect the price of electrical energy for customers represented by the Consumer Advocate.
3. The Consumer Advocate'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 the Consumer Advocate

4. Until the Consumer Advocate has had an opportunity to gain a satisfactory understanding of the matters to be considered in the Application, the Consumer Advocate will not be in a position to advocate a specific disposition of the Application.

D. Facts and Reasons Supporting Intervention

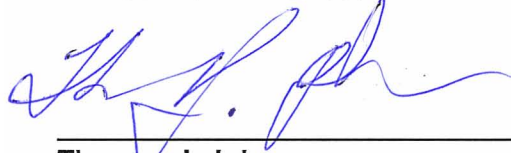
5. Until the Consumer Advocate has had an opportunity to gain a satisfactory understanding of the matters to be considered in the Application, the Consumer Advocate will not be in a position to submit what facts he intends to show in evidence or for what reasons the Board should dispose of the Application of Newfoundland Hydro in a particular matter.

E. Participation of the Consumer Advocate

6. The Consumer Advocate proposes to fully participate in the hearing of the Application and the various procedures associated with the Application including, without limitation:
- (a) directing information requests to Newfoundland Hydro as may be permitted by the Board;
 - (b) participating in technical conferences or similar processes mandated by the Board;
 - (c) cross-examining of witnesses appearing on behalf of Newfoundland Hydro or any other party;
 - (d) calling of witnesses, including expert witnesses, as is appropriate in the circumstances; and
 - (e) making representation through counsel to the Board concerning the disposition of the Application.

DATED at St. John's, Newfoundland and Labrador, this 12th day of August, 2013.

The Consumer Advocate



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