



June 5, 2014

Ms. G. Cheryl Blundon  
Board of Commissioners of Public Utilities  
120 Torbay Road, P.O. Box 12040  
St. John's, NL A1A 5B2

Dear Ms. Blundon:

**Re: Newfoundland and Labrador Hydro – Application for Approval of the Upgrade of the  
Transmission Line Corridor from Bay d'Espoir to Western Avalon**

In relation to the above noted application and further to the Notice of Application issued by the Public Utilities Board on May 8, 2014, we enclose the Intervenor's Submission of the Consumer Advocate.

A copy of this correspondence, together with the enclosure, has been forwarded directly to the parties listed below.

We trust the foregoing is found to be in order.

Yours very truly,

O'DEA, EARLE

A handwritten signature in blue ink, appearing to read 'T. Johnson', is written over the printed name 'O'DEA, EARLE'.

THOMAS JOHNSON  
TJ/cel  
encl.

cc: Newfoundland and Labrador Hydro  
Attention: Geoffrey P. Young

Newfoundland Power Inc.  
Attention: Gerard Hayes

Stewart McKelvey Stirling Scales  
Attention: Mr. Paul Coxworthy

Mr. Danny Dumaresque

Grand Riverkeeper Labrador Inc.  
Attention: Ms. Roberta Frampton Benefiel, Vice President

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

**AND IN THE MATTER OF** an Application by Newfoundland and Labrador Hydro (Hydro) pursuant to Subsection 41(3) of the Act, for approval of the Upgrade of the Transmission Line Corridor from Bay d'Espoir to Western Avalon.

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

## **INTERVENOR'S SUBMISSION**

### **General**

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

### **Interests of the Consumer Advocate**

2. The Consumer Advocate represents the interests of domestic and general electricity customer of both utilities operating in the Province and therefore has an interest in Hydro's proposed application for the Upgrade of the Transmission Line Corridor from Bay d'Espoir to Western Avalon.

### **Disposition Advocated by the Consumer Advocate**

3. It would be premature for the Consumer Advocate to advocate a particular disposition of the Application at this time as the Consumer Advocate's review of the Application is continuing at this time.

### **Facts and Reasons Supporting Intervention**

4. The reason for the Consumer Advocate's intervention is to receive and consider

materials filed in support of the Application so as to be in a position to assess whether the record before the Board indicates that Hydro's proposed Application is reasonably necessary for Hydro to meet its obligations to provide electrical service as required by the Act.

### **Participation of the Consumer Advocate**

5. In light of the Consumer Advocate's ongoing review of the Application, the Consumer Advocate cannot state at this time whether or not he shall present evidence in relation to the Application. The Consumer Advocate may wish to participate in technical conferences, file requests for information 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, in the Province of Newfoundland and Labrador, this 5<sup>th</sup> day of June, 2014.



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**THE CONSUMER ADVOCATE**

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