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June 5, 2014

Via Electronic Mail & Courier

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 Madam:

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, we enclose the original and eight (8) copies of the Intervenor's Submissions of the Island Industrial Customers Group.

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

We trust you find the foregoing satisfactory.

Yours very truly,

POOLE ALTHOUSE

Dean A. Porter

DAP/lp
Encls.

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cc: Mr. Geoffrey P. Young, Senior Legal Counsel, Newfoundland and Labrador Hydro
Mr. Thomas J. Johnson, Consumer Advocate

Dean A. Porter
E-Mail: dporter@poolealthouse.ca Direct Line: (709) 637-6454

Attn: Ms. G. Cheryl Blundon

June 5th, 2014

Page 2

Mr. Paul Coxworthy, Stewart McKelvey
Mr. Gerard M. Hayes – Newfoundland Power Inc.
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;

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")

INTERVENORS' SUBMISSION
OF THE ISLAND INDUSTRIAL CUSTOMERS GROUP

TAKE NOTICE that Corner Brook Pulp and Paper Limited, North Atlantic Refining Limited and Teck Resources Limited (the "Island Industrial Customers Group"), through their solicitors Stewart McKelvey and Poole Althouse, hereby give notice of their intention to participate in the within proceeding, in their respective positions as Island Industrial Customers of Newfoundland and Labrador Hydro ("Hydro").

Interest of the Island Industrial Customers Group

1. Each of the Island Industrial Customers Group own and operate on the Island of Newfoundland substantial industrial operations, each of which is a major consumer of power purchased from Hydro and transmitted through the Island Interconnected system, and therefore have an interest in the within Application and the proposed upgrade of the Transmission Line Corridor from Bay d'Espoir to Western Avalon.

Dispositions Sought by the Island Industrial Customers Group

2. The Island Industrial Customers Group do not yet have sufficient information, and have not yet had sufficient opportunity, to formulate any particular disposition(s) with respect to this proceeding.

Facts and Reasons Supporting Intervention

3. The Island Industrial Customers Group own and operate on the Island of Newfoundland substantial industrial operations, each of which is a major consumer of power purchased from Hydro and transmitted through the Island Interconnected system. The Island Industrial Customers may have issues specific to them, as customers of Hydro, in relation to the upgrade of the Transmission Line Corridor from Bay d'Espoir to Western Avalon.
4. The Island Industrial Customers Group repeat the foregoing paragraphs and state that they wish to participate in the within proceeding and assess the materials filed (and to be filed) to allow the Island Industrial Customers to determine whether the record is such that the Island Industrial Customers can support (or, conversely, object to) Hydro's Application for the Upgrade of the Transmission Line Corridor from Bay d'Espoir to Western Avalon.

Participation of the Island Industrial Customers Group

5. The Island Industrial Customers Group may participate in the various procedures associated with this proceeding including, without limitation,:
 - a) directing Requests for Information and other information requests to Hydro, and any other participant in this proceeding, as may be permitted by the Board;
 - b) participating in technical conferences, pre-hearing conferences, and other processes associated with this proceeding;
 - c) cross-examination of witnesses appearing on behalf of Hydro or of any other participant in any hearing in this proceeding, as may be appropriate in the circumstances of any hearing in this proceeding that may be ordered by the Board; and

- d) making representations and submissions, through counsel, to the Board concerning the disposition of this proceeding, including submissions to the Board on the recovery of costs of the Island Industrial Customers of participating in this proceeding.

Documents relating to this hearing can be served on the Island Industrial Customers Group in care of:

Mr. Paul L. Coxworthy
Stewart McKelvey
Suite 1100, Cabot Place
100 New Gower Street
St. John's, NL A1C 6K3

Telephone: 709.722.4270
Facsimile: 709.722.4565

Email: pcoxworthy@stewartmckelvey.com

AND

Mr. Dean A. Porter
Poole Althouse
49-51 Park Street
Corner Brook, NL A2H 6H7

Telephone: 709.634.6425
Facsimile: 709.634.8247

E-Mail: dporter@poolealthouse.ca

DATED at Corner Brook, Newfoundland and Labrador, this 5th day of June, 2014.

POOLE ALTHOUSE



Per: Dean A. Porter

STEWART MCKELVEY



Per: Paul L. Coxworthy

TO: The Board of Commissioners of Public Utilities
Suite E210, Prince Charles Building
120 Torbay Road
P.O. Box 21040
St. John's, NL A1A 5B2
Attention: Board Secretary

TO: Newfoundland & Labrador Hydro
P.O. Box 12400
500 Columbus Drive
St. John's, NL A1B 4K7
Attention: Geoffrey P. Young
Senior Legal Counsel

TO: Newfoundland Power Inc.
P.O. Box 8910
55 Kenmount Road
St. John's, NL A1B 3P6
Attention: Gerard Hayes,
Senior Legal Counsel

TO: Corner Brook Pulp & Paper Limited
c/o Stewart McKelvey
Cabot Place, 100 New Gower Street
P.O. Box 5038

St. John's, NL A1C 5V3
Attention: Paul Coxworthy

TO: Thomas J. Johnson, Consumer Advocate
O'Dea, Earle
323 Duckworth Street
P.O. Box 5955, Stn. C
St. John's, NL A1C 5X4