

HAND DELIVERED

June 5, 2014

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

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

Ladies and Gentlemen:

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

Please find enclosed the original and 12 copies of Newfoundland Power's Intervenor's Submission in relation to the above-noted Application.

For convenience, the Intervenor's Submission is provided on three-hole punched paper.

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

If you have any questions regarding the enclosed, please contact the undersigned at your convenience.

Yours very truly,



Gerard M. Hayes
Senior Counsel

Enclosures

c. Geoffrey Young
Newfoundland and Labrador Hydro

Paul Coxworthy
Stewart McKelvey

Sheryl Nisenbaum
Praxair Canada Inc.

Thomas Johnson
O'Dea Earle Law Offices

Thomas O'Reilly, QC
Vale Newfoundland and Labrador Limited

Danny Dumaresque



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

A. General

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

B. Interest of Newfoundland Power

2. Newfoundland Power purchases approximately 85% of Newfoundland and Labrador Hydro’s (“Hydro”) annual production of electrical energy on the Island of Newfoundland, and distributes electricity to the vast majority of customers served by the Island Interconnected System. The Application requests that the Board approve capital expenditures related to the installation of a new 230 kV transmission line between Hydro’s Bay d’Espoir and Western Avalon terminal stations to provide ongoing reliable electrical service to the Island Interconnected System. Approval of the Application will affect the price of electrical energy for Newfoundland Power’s customers.
3. As Hydro’s largest customer, Newfoundland Power’s interest in the Application includes, without limitation, an interest in ensuring that electrical service provided by Hydro on the Island Interconnected System is reliable, and that the rates to be charged by Hydro for electricity 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

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

D. Facts and Reasons Supporting Intervention

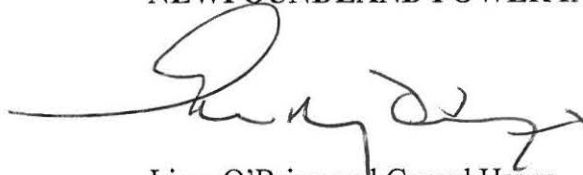
5. Until Newfoundland Power has had an opportunity to gain a satisfactory understanding of the matters to be considered in the Application, Newfoundland Power will not be in a position to submit what facts it intends to show in evidence or for what reasons the Board should dispose of the Application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

E. Participation of Newfoundland Power

6. Newfoundland Power proposes to fully participate in the hearing of the Application and the various procedures associated with the Application.

DATED at St. John's, Newfoundland this 5th day of June, 2014.

NEWFOUNDLAND POWER INC.



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