

POOLE ALTHOUSE
BARRISTERS AND SOLICITORS

Jamie Merrigan, K.C.
Dean A. Porter

J. Annette Bennett
Robby D. Ash

Glen G. Seaborn
Melissa May

Toll Free: 1 877 634-3136
E-Mail: info@poolealthouse.ca
www.poolealthouse.ca

■ **CORNER BROOK**
Telephone: 709 634 -3136
Fax: 709 634 8247/9815
Western Trust Building
49-51 Park Street
Corner Brook, NL
Canada A2H 2X1

Edward P. Poole, Q.C., Retired
D. Paul Althouse, Q.C., Retired

□ Happy Valley-Goose Bay
Telephone: 709 896-8777
Fax: 709 896-8779
49A Grenfell Street
PO Box 1450, Station B
Happy Valley-Goose Bay, NL
Canada A0P 1E0

August 1, 2023

Via Electronic Mail

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

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

Dear Ms. Blundon:

Re: Newfoundland and Labrador Hydro – 2024 Capital Budget Application

In relation to the above noted, please find enclosed the Intervenors' Submission of the Island Industrial Customers Group.

We trust you find the foregoing satisfactory.

Yours very truly,

POOLE ALTHOUSE

Dean A. Porter

DAP/ag

Encl.

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cc Industrial Customers Group
Paul Coxworthy, Stewart McKelvey
Denis Fleming, Cox & Palmer

Newfoundland & Labrador Hydro
Shirley Walsh
NLH Regulatory

Newfoundland Power
Dominic J. Foley
Regulatory Email

Board of Commissioners of Public Utilities
Jacqui H. Glynn
Sara Kean
PUB Official Email

Consumer Advocate
Dennis Browne, K.C., Browne Fitzgerald Morgan & Avis
Stephen F. Fitzgerald, K.C., Browne Fitzgerald Morgan & Avis
Bernice Bailey, Browne Fitzgerald Morgan & Avis

Labrador Interconnected Group
Senwung F. Luk, Olthuis Kleer Townshend LLP
Nick Kennedy, Olthuis Kleer Townshend LLP

IN THE MATTER OF the *Public Utilities Act*, RSNL 1990, c P-47 (the “Act”); and

IN THE MATTER OF an Application by Newfoundland and Labrador Hydro (“Hydro”) for approval of:

- (a) its capital budget for 2024, pursuant to Section 41(1) of the Act;
- (b) its proposed capital purchases and construction projects for 2024 in excess of \$750,000, pursuant to Section 41(3)(a) of the Act; and
- (c) for an Order, pursuant to Section 78 of the Act, fixing and determining its average rate base for 2022 (“Application”).

To: The Board of Commissioners of Public Utilities

INTERVENORS’ SUBMISSION OF THE ISLAND INDUSTRIAL CUSTOMERS GROUP

TAKE NOTICE that **Corner Brook Pulp and Paper Limited, Braya Renewable Fuels (Newfoundland) LP (formerly NARL Refining Limited Partnership) and Vale Newfoundland and Labrador Limited (the “Island Industrial Customers Group”)**, through their solicitors Poole Althouse, Stewart McKelvey and Cox & Palmer, hereby give notice of their intention to participate in the within Application in their respective positions as Island Industrial Customers of the Applicant Newfoundland and Labrador Hydro (the “Applicant”) which are affected by the rates charged by the Applicant.

Interest of the Island Industrial Customers Group

1. Each of the Members of the Island Industrial Customers Group presently own and operate on the Island of Newfoundland substantial industrial operations, each of which is a major consumer of power from the Applicant.

Disposition Sought by the Island Industrial Customers Group

2. Given the recent filing of the Application, and the various matters raised by the Application and to be addressed by Requests for Information and by other pre-hearing and hearing processes, the

Island Industrial Customers Group does not yet have sufficient information, and have not yet had sufficient opportunity, to formulate particular dispositions with respect to the various approvals sought by the Applicant.

Facts and Reasons Supporting Intervention

3. The Island Industrial Customers Group repeat the foregoing paragraph and state that there has not yet been sufficient opportunity for the Island Industrial Customers Group to submit what facts they intend to show in evidence or for what reasons the Board should dispose of the various approvals sought by the Applicant in a particular manner.

Participation of the Island Industrial Customers Group

4. The Island Industrial Customers Group intends to participate in the various procedures associated with the Application including, without limitation:
 - (a) directing Requests 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 ordered by the Board;
 - (d) calling witnesses, including expert witnesses, as may be appropriate in the circumstances of any hearing on the Application that may be ordered by the Board;
 - (e) making representations and submissions, through counsel, to the Board concerning the disposition of the Application, including for the award of costs to the Island Industrial Customers Group in respect of their intervention and participation in the Application.

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

Mr. Dean A. Porter
Poole Althouse
49-51 Park Street
Corner Brook, NL A2H 2X1

Telephone: (709) 634-3136
Telecopier: (709) 634-8247

E-mail: dporter@poolealthouse.ca

AND

Mr. Paul L. Coxworthy
Stewart McKelvey
Suite 1100, Cabot Place
100 New Gower Street
PO Box 5038
St. John's, NL A1C 5V3

Telephone: (709) 722-4279
Telecopier: (709) 722-4565

E-mail: pcoxworthy@stewartmckelvey.com

AND

Mr. Denis J. Fleming
Cox & Palmer
Scotia Centre
Suite 1100, 235 Water Street
St. John's, NL A1C 1B6

Telephone: (709) 738-7800
Telecopier: (709) 738-7999

E-mail: dfleming@coxandpalmer.com

DATED at Corner Brook, Newfoundland and Labrador, this 1 day of August, 2023.

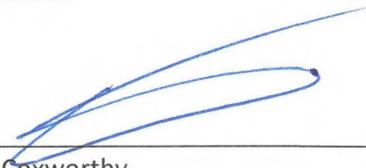
POOLE ALTHOUSE

Per: _____

Dean A. Porter

STEWART MCKELVEY

Per:



for Paul L. Coxworthy

COX & PALMER

Per:



for Denis J. Fleming

- TO: The Board of Commissioners of Public Utilities
Attention: Ms. Cheryl Blundon, Board Secretary, Ms. Jacqui Glynn, Ms. Sara Kean,
PUB Official Email
- TO: Newfoundland & Labrador Hydro
Attention: Ms. Shirley Walsh, NLH Regulatory
- TO: Newfoundland Power Inc.
Attention: Mr. Dominic J. Foley, NP Regulatory
- TO: Labrador Interconnected Group
Attention: Senwung F. Luk, Nick Kennedy
- TO: Consumer Advocate
Attention: Mr. Dennis Browne, K.C., Mr. Stephen F. Fitzgerald, K.C., Ms. Bernice Bailey