Newfoundland and Labrador Hydro
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November 2, 2026

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

Attention: Mike McNiven
Senior Regulatory Advisor & Board Secretary

Re: Newfoundland Power Inc. – 2027 Wesleyville and Greenhill Thermal Generation Supplemental Application – Intervenor Submission

Please find attached Newfoundland and Labrador Hydro's Intervenor Submission in relation to Newfoundland Power Inc.'s 2027 Wesleyville and Greenhill Thermal Generation Supplemental Application.

Yours truly,

NEWFOUNDLAND AND LABRADOR HYDRO

Shirley A. Walsh
Senior Legal Counsel, Regulatory
SAW/kd

Encl.

ecc:

Board of Commissioners of Public Utilities
Jacqui H. Glynn
Ryan Oake
Colleen Jones
Board General

Consumer Advocate
Adrienne H.Y. Ding, O'Dea Earle
Justin W. King, O'Dea Earle
Consumer Advocate General

Newfoundland Power Inc.
Dominic J. Foley
Douglas W. Wright
Regulatory Email

IN THE MATTER OF the *Public Utilities Act* (the "*Act*"); and

IN THE MATTER OF an application by Newfoundland Power Inc. ("Newfoundland Power") for an Order pursuant to Section 41 of the *Act* approving supplemental capital expenditures required for the refurbishment of thermal facilities at Wesleyville and Greenhill.

To: The Board of Commissioners of Public Utilities ("Board")

INTERVENOR SUBMISSION OF NEWFOUNDLAND AND LABRADOR HYDRO ("HYDRO"):

A. Background

1. Hydro, a corporation continued and existing under the *Hydro Corporation Act, 2024*, is a public utility within the meaning of the *Act* and is subject to the provisions of the *Electrical Power Control Act, 1994 ("EPCA")*.

B. Hydro's Interest in the Matter

2. Newfoundland Power is Hydro's largest customer. The energy that Newfoundland Power purchases from Hydro constitutes approximately 85% of the energy that is generated or purchased and transmitted by Hydro for consumption within the province of Newfoundland and Labrador.

3. Hydro is a customer of Newfoundland Power at several of its locations throughout the island portion of the province, including Hydro's head office in St. John's.

4. It is reasonable to expect that regulatory decisions and principles that are developed and applied to Newfoundland Power will be applicable to Hydro.

5. For all of the aforementioned reasons, Hydro submits that it has an interest in ensuring that the capital expenditures proposed in the supplemental capital application filed by Newfoundland Power are reasonably necessary for Newfoundland Power to meet its obligation to provide electrical service as required by the *Act* and the *EPCA*.

C. Disposition Advocated by Hydro

6. As of the date of this submission, Hydro is in the process of reviewing and analysing the application. As such, Hydro has not had an opportunity to determine the disposition of the application that it may advocate.

7. Additionally, as Hydro's review is ongoing, Hydro has not had an opportunity to make decisions as to whether it will be providing evidence or as to which arguments it may make in support of any position it may advocate before the Board.

D. Hydro's Participation in the Hearing

8. Hydro is requesting intervenor status for the purpose of obtaining all information filed in the proceeding. Hydro's intervention may include, but not be limited to, any or all of the following activities:

   a) Participating in presentations and/or technical conferences;

   b) Directing requests for information to Newfoundland Power and other parties as may be permitted by the Board;

   c) Cross-examining witnesses who testify in this matter; and

   d) Making legal arguments and other representations to the Board.

E. Communications

9. Communications with respect to this application should be forwarded to Shirley A. Walsh, Senior Legal Counsel, Regulatory for Hydro.

DATED at St. John's in the province of Newfoundland and Labrador on this 2nd day of November 2026.

NEWFOUNDLAND AND LABRADOR HYDRO



Shirley A. Walsh
Counsel for the Applicant
Newfoundland and Labrador Hydro,
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St. John's, NL A1B 4K7
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