STEWART MCKELVEY
LAWYERS • AVOCATS

Cabot Place, 1100 – 100 New Gower Street, P.O. Box 5038
St. John's NL A1C 5V3 Canada tel: 709.722.4270 fax: 709.722.4565 stewartmckelvey.com

File Reference: SM003789.00001

Dana Constantine
Direct Dial: 709.570.5790
drconstantine@stewartmckelvey.com

November 17, 2026

Via Electronic Mail

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

Attention: Mr. Mike McNiven, Board Secretary

Dear Mr. McNiven:

Re: Newfoundland Power 2027 Wesleyville and Greenhill Thermal Generation Supplemental Application

In relation to the above-noted Application, please find enclosed the Intervenor's Submission of the Island Industrial Customer Group.

We trust the above and enclosed to be in order.

Yours truly,

Stewart McKelvey

Dana Constantine

Dana Constantine

DC/bm

Enclosure
c. Glen G. Seaborn
Denis J. Fleming

Public Utilities Board
Jacqui Glynn
Ryan Oake
Mike McNiven
Colleen Jones
Board Record

Newfoundland and Labrador Hydro
Shirley Walsh
NLH Regulatory

Newfoundland Power Inc.
Dominic Foley
NP Regulatory

Consumer Advocate
Adrienne H. Y. Ding
Consumer Advocate General

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

IN THE MATTER OF an application by Newfoundland Power Inc. 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

INTERVENORS' SUBMISSION OF THE ISLAND INDUSTRIAL CUSTOMER GROUP

TAKE NOTICE that **Braya Renewable Fuels (Newfoundland) LP, Corner Brook Pulp and Paper Limited, Marathon Gold Corporation, and Vale Newfoundland and Labrador Limited (the "Island Industrial Customer Group")**, through their solicitors Stewart McKelvey, Poole Althouse and Cox & Palmer, hereby give notice of their intention to participate in the within Application in their respective positions as Island Industrial Customers of Newfoundland and Labrador Hydro ("NL Hydro"). The within Application by Newfoundland Power Inc (the "Applicant") raises issues which may impact the rates charged by NL Hydro to its customers, including the Island Industrial Customer Group.

Interest of the Island Industrial Customer Group

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

Disposition Sought by the Island Industrial Customer 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 Customer Group does not yet have sufficient information, and has 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 Customer Group repeats the foregoing paragraph and states that there has not yet been sufficient opportunity for the Island Industrial Customer 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 Customer Group

4. The Island Industrial Customer 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; and,
   (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 Customer Group in respect of their intervention and participation in the Application.

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

Glen G. Seaborn
Poole Althouse
49-51 Park Street
Corner Brook, NL A2H 2X1

Telephone: (709) 634-3136
Telecopier: (709) 634-8247
E-mail: gseaborn@poolealthouse.ca

AND

Dana Constantine
Stewart McKelvey
Suite 1100, Cabot Place
100 New Gower Street
PO Box 5038
St. John's, NL A1C 5V3

Telephone: (709) 570-5790
Telecopier: (709) 722-4565
E-mail: drconstantine@stewartmckelvey.com

AND

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 St. John's, Newfoundland and Labrador, this 17th day of November, 2026.

POOLE ALTHOUSE

Per: Dana Constantine
for Glen G. Seaborn

STEWART MCKELVEY

Per: Dana Constantine
Dana Constantine

COX & PALMER

Per: Dana Constantine
for Denis J. Fleming

TO: The Board of Commissioners of Public Utilities
Mike McNiven, Board Secretary, Jacqui Glynn, Ryan Oake, Board General

TO: Newfoundland & Labrador Hydro
Shirley Walsh, NLH Regulatory

TO: Newfoundland Power Inc.
Dominic J. Foley, NP Regulatory

TO: Consumer Advocate
Adrienne H. Y. Ding, Consumer Advocate General