

Office of the Consumer Advocate

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May 9, 2025

Board of Commissions of Public Utilities
120 Torbay Road, P.O. Box 2140
St. John's, NL A1A 5B2

Attention: Jo Galarneau
Executive Director and Board Secretary

Dear Ms. Galarneau:

**Re: Newfoundland and Labrador Hydro – Build Application re the
Bay d'Espoir Hydroelectric Generating Facility (“BDE”) Unit 8
and the Avalon Combustion Turbine (“Avalon CT”)
- Intervenor Submission of the Consumer Advocate**

Further to the above-captioned, enclosed please find the Consumer Advocate's Intervenor Submission.

Yours truly,



Stephen Fitzgerald, KC

Counsel for the Consumer Advocate

Encl.

/bb

cc **Newfoundland & Labrador Hydro**
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NLH Regulatory (NLHRegulatory@nlh.nl.ca)

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IN THE MATTER OF the *Electric Power Control Act*, 1994, SNL 1994, Chapter E-5.1 (“EPCA”) and the *Public Utilities Act*, RSNL 1990, Chapter P-47 (“Act”), and regulations thereunder; and

IN THE MATTER OF an Application by Newfoundland and Labrador Hydro (“Hydro”) for an Order approving the capital expenditures necessary for certain capital related to the future construction of Bay d’Espoir Hydroelectric Generating Facility (“BDE”) Unit 8 and the Avalon Combustion Turbine (“Avalon CT”), pursuant to Section 41(3) of the Act.

CONSUMER ADVOCATE INTERVENOR SUBMISSION

1. The Consumer Advocate (the “Consumer Advocate”), appointed as set out in Section 117 of the *Public Utilities Act*, will intervene in the above referenced Application to represent these purposes:
 - a. To represent consumers in all matters pertaining to the Application;
 - b. To advocate that the Board apply the policy established under the *Electrical Power Control Act* 1994 (the “Act”) and in particular to ensure that the Application will result in power being delivered to consumers at the lowest possible cost consistent with reliable service;
 - c. To attend conferences and hearings, as the case may be, and to file Requests for Information and written submission;
 - d. And to all matters relating to the foregoing.

2. The issues the Consumer Advocate is concerned with in this Application are, *inter alia*, as stated in its Submission to the Public Utilities Board dated April 11, 2025.

DATED at St. John's, Newfoundland and Labrador, this 9th day of May, 2025.



Stephen Fitzgerald, KC

Counsel to the Consumer Advocate

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