

**IN THE MATTER OF** the Electrical 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 approval of capital expenditures for the purchase, construction, and installation of Unit 8 at the Bay d'Espoir Hydroelectric Generating Facility ("Bay d'Espoir") and a combustion turbine ("CT") located on the Avalon Peninsula.

To: The Board of Commissioners of Public Utilities

**INTERVENORS' SUBMISSION OF THE ISLAND INDUSTRIAL CUSTOMER GROUP**

**TAKE NOTICE** that Corner Brook Pulp and Paper Limited, Braya Renewable Fuels (Newfoundland) LP, and Vale Newfoundland and Labrador Limited (the "Island Industrial Customer Group"), through their solicitors Poole Althouse, Stewart McKeivey and Cox & Palmer, hereby give notice of their intention to participate in the within Application in their respective positions as present or future 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 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 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 (it is submitted) by Requests for Information and by other pre-hearing and hearing processes, the Island Industrial Customer 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 Customer Group repeat the foregoing paragraph and state 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 Customers 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;
  - (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 Application can be served on the Island Industrial Customer Group in care of:

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**AND**

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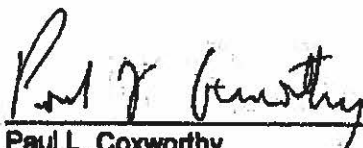
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**DATED** at St. John's, Newfoundland and Labrador, this \_\_\_\_ day of May, 2025.



**POOLE ALTHOUSE**

Per:   
Glen G. Seaborn

**STEWART MCKELVEY**

Per:   
Paul L. Coxworthy

**COX & PALMER**

Per:   
Denis J. Fleming  


**Ecc:**  
Board of Commissioners of Public Utilities  
Jacqui H. Glynn  
PUB Official email

Island Industrial Customer Group  
Paul L. Coxworthy, Stewart McKelvey  
Denis Fleming, Cox & Palmer  
Dean A. Porter, Poole Althouse

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