

WHENEVER. WHEREVER.
We'll be there.



May 6, 2025

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

Attention: Jo-Anne Galarneau
Executive Director and Board Secretary

Dear Ms. Galarneau:

Re: Newfoundland and Labrador Hydro – 2025 Build Application

Please find enclosed Newfoundland Power's Intervenor Submission in relation to the above-noted Application.

If you have any questions regarding the enclosed, please contact the undersigned at your convenience.

Yours truly,

Dominic Foley
Legal Counsel

cc. Shirley Walsh
Newfoundland & Labrador Hydro

Paul Coxworthy
Stewart McKelvey

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Newfoundland Power Inc.

55 Kenmount Road • P.O. Box 8910 • St. John's, NL A1B 3P6

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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 (the “Application”).

TO: The Board of Commissioners of Public Utilities (the “Board”)

INTERVENOR SUBMISSION OF NEWFOUNDLAND POWER INC.

A. General

1. Newfoundland Power Inc. (“Newfoundland Power”) is a body corporate, organized and existing pursuant to the laws of Newfoundland and Labrador and is a public utility within the meaning of the Act.
2. Newfoundland Power wishes to participate in the Application.

B. Interest of Newfoundland Power

3. Newfoundland Power purchases approximately 93% of its electricity requirements from Hydro. As Hydro’s largest customer, Newfoundland Power’s interest in the Application includes, without limitation, an interest in ensuring that the proposed purchase, construction, and installation of Bay d’Espoir Unit 8 and the Avalon CT are carried out in a manner that is compliant with the Act and the EPCA.

C. Disposition Advocated by Newfoundland Power

4. Newfoundland Power submits that the Board is required by the Act to approve those proposed improvements or additions to Hydro’s property as are shown by the record before the Board to be reasonably necessary for Hydro to meet its obligations to provide electrical service as required by the Act and the EPCA.
5. As of the date of this submission, Newfoundland Power is in the process of reviewing and analyzing the Application. The disposition of the Application that Newfoundland Power may ultimately advocate is dependant upon Newfoundland Power’s review of the record before the Board, including, without limitation, Hydro’s responses to requests for information, expert evidence, oral testimony and other evidence as the case may be.

D. Facts and Reasons Supporting Intervention

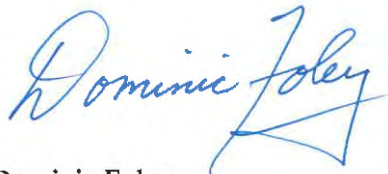
6. The primary reason for Newfoundland Power's intervention is to receive and consider materials filed in support of the Application and to participate in all procedural steps as may be established by the Board as part of its consideration of the Application.
7. Newfoundland Power's intervention will allow it to make submissions to the Board as to whether the record before the Board indicates that Hydro's proposed purchase, construction, and installation of Bay d'Espoir Unit 8 and the Avalon CT are reasonably necessary for Hydro to meet its obligations to provide electrical service as required by the Act and the EPCA.

E. Participation of Newfoundland Power

8. Newfoundland Power proposes to fully participate in the hearing of the Application and the various procedures associated with the Application including, without limitation:
 - a) directing requests for information to Hydro as may be permitted by the Board;
 - b) participating in technical conferences or similar processes mandated by the Board;
 - c) submitting evidence, including expert evidence, as necessary and making representations to the Board concerning the disposition of the Application;
 - d) cross-examining witnesses as may be appropriate in the circumstances; and
 - e) participation in other processes as the Board may mandate or allow or circumstances may require.

DATED at St. John's, Newfoundland and Labrador this 6th day of May, 2025.

NEWFOUNDLAND POWER INC.



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