

IN THE MATTER OF the *Public Utilities Act*,
RSNL 1990, c P-47 (the "Act"); and

IN THE MATTER OF an Application by
Newfoundland and Labrador Hydro
("Hydro") for approval of:

- (a) Hydro's 2026 Capital Budget of \$131.6 million as set out in Appendix A of Schedule 1, pursuant to Section 41(1) of the Act;
- (b) Hydro's 2026 capital purchases and construction projects in excess of \$750,000 as set out in the appendices to Schedule 1, pursuant to Section 41(3) of the Act;
- (c) a contribution by those customers noted in paragraph 14 of the Application, of an amount equal to the capital cost of the work described herein related to assets which solely serve the identified customer, pursuant to section 41(5) of the Act; and
- (d) fixing and determining Hydro's average rate base for 2024 in the amount of \$2,379,043,000 as set out in Schedule 6, pursuant to Section 78 of the Act.

To: The Board of Commissioners of Public Utilities

INTERVENORS' SUBMISSION OF THE ISLAND INDUSTRIAL CUSTOMERS GROUP

TAKE NOTICE that **Corner Brook Pulp and Paper Limited, Braya Renewable Fuels (Newfoundland) LP and Vale Newfoundland and Labrador Limited (the "Island Industrial Customers Group")**, through their solicitors Poole Althouse, Stewart McKelvey and Cox & Palmer, hereby give notice of their intention to participate in the within Application in their respective positions as 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 Customers Group

1. Each of the Members of the Island Industrial Customers 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 by Requests for Information and by other pre-hearing and hearing processes, the Island Industrial Customers 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 Customers Group repeat the foregoing paragraph and state that there has not yet been sufficient opportunity for the Island Industrial Customers 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 Customers 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 Customers Group in respect of their intervention and participation in the Application.

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

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DATED at Corner Brook, Newfoundland and Labrador, this 31st day of July, 2025.

POOLE ALTHOUSE

Per:



Glen G. Seaborn

STEWART MCKELVEY

Per:



for: Paul L. Coxworthy

COX & PALMER

Per:



for: Denis J. Fleming

TO: The Board of Commissioners of Public Utilities
Attention: Ms. Jo-Anne Galarneau, Board Secretary, Ms. Jacqui Glynn, Mr. Mike McNiven,
PUB Official Email

TO: Newfoundland & Labrador Hydro
Attention: Ms. Shirley Walsh, Dana Pope, NLH Regulatory

TO: Newfoundland Power Inc.
Attention: Mr. Dominic J. Foley, D. Wright, NP Regulatory

TO: Labrador Interconnected Group
Attention: Senwung F. Luk, Nick Kennedy

TO: Consumer Advocate
Attention: Mr. Dennis Browne, K.C., Mr. Stephen F. Fitzgerald, K.C., Ms. Sarah Fitzgerald,
Ms. Bernice Bailey

TO: Iron Ore Company of Canada
Attention: Greg Moores, K.C.

TO: Teck Resources Limited
Attention: Shawn Kinsella

TO: Tacora Resources Inc.
Attention: Baseem Saeed