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## O'DEA, EARLE

LAW OFFICES

October 26, 2006

**Via Email & Courier**

Ms. G. Cheryl Blundon  
Director of Corporate Services and Board Secretary  
Board of Commissioners of Public Utilities  
120 Torbay Road  
P.O. Box 21040  
St. John's, NL A1A 5B2

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Dear Ms. Blundon:

**Re: Newfoundland Power Inc.'s  
2007 Amortization and Cost Deferrals Application**

Enclosed please find the Consumer Advocate's Notice of Intervention in respect of the above matter.

We trust the foregoing is found to be in order.

Yours very truly,

O'DEA, EARLE



THOMAS JOHNSON  
TJ/cel  
encl.

cc: Ian Kelly, Q.C. and Peter Alteen  
Counsel for Newfoundland Power Inc.  
P.O. Box 8910, 55 Kenmount Road  
St. John's, NL A1B 3P6  
Via Facsimile: 737-2974 & Mail

**IN THE MATTER OF** the *Public Utilities Act*, R.S.N.L., c.P-47 (the “Act”); and

**IN THE MATTER OF** an Application (the “Application”) by Newfoundland Power Inc. for an order pursuant to Sections 58, 78 and 80 of the Act:

- (a) approving a certain amortization and the deferred recovery of certain costs for 2007; and
- (b) approving forecast values for rate base and invested capital for use in the automatic adjustment formula for the calculation of the rate of return on rate base for 2007 pursuant to Order No. P.U. 19 (2003).

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

### **INTERVENOR’S SUBMISSION**

1. The Consumer Advocate wishes to intervene in the Application.

#### **Interests of the Consumer Advocate**

2. The Consumer Advocate represents the interests of domestic and general service consumers of electricity in the Province of Newfoundland and Labrador and therefore has an interest in Newfoundland Power Inc.’s above-referenced Application.

#### **Disposition Advocated by the Consumer Advocate**

3. The Consumer Advocate wishes to receive further information from Newfoundland Power Inc. in the RFI process before advocating a specific disposition of Newfoundland Power Inc.’s Application.

#### **Facts and Reasons Supporting Intervention**

4. The reason for the Consumer Advocate's intervention is to receive materials filed in the proceeding so as to be in a position to consider whether those materials disclose any reason for more active participation by the Consumer Advocate in respect of the Application.

#### **Participation of the Consumer Advocate**

5. The Consumer Advocate may decide to present evidence in relation to the Application. However, the Consumer Advocate does wish to file requests for information as provided by the *Board of Commissioners of Public Utilities Regulations, 1996*, and to avail of the right to cross-examine witnesses or to submit argument at a public hearing of the Application, all as the circumstances may require.

**DATED** at St. John's, in the Province of Newfoundland and Labrador, this \_\_\_\_ day of October, 2006.

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**THE CONSUMER ADVOCATE**

Thomas Johnson, LL.B.  
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