

CANADA
PROVINCE OF QUÉBEC
DISTRICT OF MONTRÉAL
N° : R-3757-2011

RÉGIE DE L'ÉNERGIE

HYDRO-QUÉBEC TRANSÉNERGIE

(hereinafter « HQT »)

Applicant

and

Newfoundland and Labrador Hydro,
Hydro Place, 500 Columbus Drive P.O.
Box 12400, St-John's, Newfoundland A1B
4K7

(hereinafter « NLH »)

Intervener

Request for intervention by NLH on HQT's Application to obtain the required permission for the acquisition and construction of buildings or assets for transmission of electricity - Transmission Provider's Project on connecting La Romaine Complex to the transmission system (R-3757-2011)

THE INTERVENER, NLH, FOR PURPOSES OF ITS REQUEST, RESPECTFULLY SUBMITS THE FOLLOWING :

I. NATURE AND VALIDITY OF ITS INTEREST AND REPRESENTATIONS

1. Following publication, on March 2, 2011, of the Notice to interested parties, NLH wishes to inform the Régie of its intention to intervene in the matter of HQT's Application for permission to acquire and construct buildings or assets for transmission of electricity - Transmission Provider's Project on connecting La Romaine Complex to the transmission system (R-3757-2011).
2. NLH is a Nalcor Energy (« **Nalcor** ») company.
3. Nalcor is 100% owned by the Province of Newfoundland and Labrador.
4. NLH is a point-to-point transmission service customer of HQT. It relies on its use of HQT's transmission system for wheel through service, and the use of the systems interconnection at Lab-HQT, which may possibly be affected by HQT's present Application.

II. REASONS IN SUPPORT OF THE INTERVENTION AND CONCLUSIONS SOUGHT

5. NLH, as a Hydro-Quebec transmission customer, has a vested interest in the choice of the means by which HQT plans and invests in the HQ transmission system.
6. NLH, as a Hydro-Quebec transmission customer, has also a vested interest in ensuring that the integration of HQ's hydroelectric production from the La Romaine Complex into HQT's transmission system is carried out according to *Hydro-Québec's Open Access Transmission Tariff (the "OATT") and to the Regulation respecting the conditions and cases where authorization is required from the Régie de l'énergie (c. R-6.01, r. 2)*.
7. NLH intends to participate in the written process launched by the Régie and, upon completion of its own analysis of HQT written evidence, NLH could file Information requests and could request access to any confidential information filed by HQT (Annex 2, 3 and 4 of HQT-1, document 1). To this end, NLH and its representative will be prepared to sign any confidentiality or other agreement that may be required by HQT, in such event.
8. NLH also reserves its right to file written evidence.
9. NLH respectfully requests that all communications with it, in respect of the present case, be forwarded to its attorney whose coordinates are as follows :

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IV. CONCLUSION

10. The present request is well founded in fact and in law.

FOR THESE REASONS, THE INTERVENER RESPECTUFLY REQUEST THE RÉGIE TO:

-TO GRANT NLH's request for intervention;

-TO GRANT permission to NLH to intervene in the Régie's case R-3757-2011.

Montréal, March 14, 2011

(s) Fasken Martineau DuMoulin

Copie conforme

FASKEN MARTINEAU DuMOULIN L.L.P.
Attorneys for the Intervener