

1999

NSP1-P-871

NOVA SCOTIA UTILITY AND REVIEW BOARD**IN THE MATTER OF:** *The Public Utilities Act, R.S.N.S., 1989, c. 380 as amended;*

- and -

IN THE MATTER OF: An Application by Nova Scotia Power Incorporated for approval of a load retention rate.**INTERVENTION OF IRVING OIL LIMITED**

Take Notice that Irving Oil Limited ("Irving Oil") hereby intervenes in this proceeding, and files this Intervention pursuant to the Notice of Hearing in the form approved by the Nova Scotia Utility and Review Board. In support of this Intervention, Irving Oil states as follows:

1. The names and contact particulars of the persons to whom communications concerning this proceeding should be addressed are:

Irving Oil Limited
400 Pleasant Street
Dartmouth, Nova Scotia
B2Y 3S5
Phone: (902) 494-5000
Fax: (902) 469-3447

Stewart McKelvey Stirling Scales
1959 Upper Water Street Suite 900
PO Box 997
Halifax NS B3J 2X2
Phone: (902) 420-3328
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rgrant@smss.com

Attention:
John DeCoursey
Regional Sales Manager - NS

Attention:
Robert G. Grant

and

Steve Kirstiuk,
General Manager - Business Development

2. Irving Oil is a privately held corporation organized and existing under the laws of the Province of New Brunswick, Canada with its main office and principal place of business at

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10 Sydney Street, Saint John, NB, E2L 4K1, Canada. The business of Irving Oil involves the sale of energy to its customers. Irving Oil refines crude oil into petroleum products which it markets through a network of service stations located throughout Atlantic Canada, Quebec, eastern Ontario, and New England. Irving Oil's heating division is a supplier of heating oil, propane and of oil and propane heating equipment installations and service in the Atlantic Canada region. Irving Oil's petroleum refinery, located in Saint John, New Brunswick, has a nameplate crude oil processing capacity of 250,000 barrels of crude oil per day.

3. Irving Oil will integrate natural gas into its operations once natural gas becomes available in Atlantic Canada through the development of the Sable Offshore Energy Project and the Maritimes & Northeast Pipeline Project. It has contracted with Duke Energy Marketing Limited Partnership to purchase substantial quantities of Sable gas on a firm basis for a minimum fifteen-year term, and has entered into corresponding firm transportation service agreements with Maritimes & Northeast Pipeline Limited Partnership ("Maritimes, L.P."), the operator of the Canadian portion of the Maritimes & Northeast Pipeline Project. Irving Oil is interested in the development of industrial, commercial and residential markets for natural gas in the Provinces of New Brunswick and Nova Scotia, and elsewhere in Atlantic Canada.

4. Irving Oil intends to supply natural gas to Nova Scotia homes and businesses, as well as peaking supplies, load balancing and related services to natural gas distribution customers in Nova Scotia.

5. Irving Oil and its affiliated companies are substantial consumers of energy, both electrical and consumable fuels.

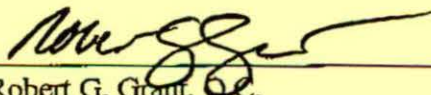
6. Both as a consumer and supplier of energy, Irving Oil is interested in ensuring the operation of a competitive free market for the purchase and sale of energy in Nova Scotia.

7. Irving Oil has a substantial and direct interest in this proceeding.

Irving Oil Limited respectfully requests that it be permitted to intervene as a party in this proceeding so that it may be afforded the opportunity to protect its interests.

Dated at Halifax, Nova Scotia this 23rd day of December, 1999.

Respectfully submitted,


Robert G. Grant, Q.C.
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1959 Upper Water Street Suite 900
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Halifax NS B3J 2X2
SOLICITORS FOR IRVING OIL LIMITED

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TO:

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Halifax NS B3J 383

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All Intervenors