Newfoundland & Labrador

BOARD OF COMMISSIONERS OF PUBLIC UTILITIES

IN THE MATTER OF THE

2024 CAPITAL BUDGET APPLICATION

FILED BY

NEWFOUNDLAND AND LABRADOR HYDRO

DECISION AND ORDER OF THE BOARD

ORDER NO. P.U. 35(2023)

BEFORE:

Dwanda Newman, LL.B. Vice-Chair

John O'Brien, FCPA, FCA, CISA Commissioner

Christopher Pike, LL.B., FCIP Commissioner

NEWFOUNDLAND AND LABRADOR BOARD OF COMMISSIONERS OF PUBLIC UTILITIES

REASONS FOR DECISION

ORDER NO. P.U. 35(2023)

IN THE MATTER OF the Electrical Power Control Act, 1994, SNL 1994, Chapter E-5.1 (the "EPCA") and the Public Utilities Act, RSNL 1990, Chapter P-47 (the "Act"), as amended, and regulations thereunder; and

IN THE MATTER OF an application by Newfoundland and Labrador Hydro for an Order pursuant to sections 41 and 78 of the Act: (a) approving capital expenditures for 2024 projects and multi-year projects commencing in 2024; (b) approving its 2024 Capital Budget; and (c) fixing and determining its average rate base for 2022.

BEFORE:

Dwanda Newman, LL.B. Vice-Chair

John O'Brien, FCPA, FCA, CISA Commissioner

Christopher Pike, LL.B., FCIP Commissioner

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DECISION SUMMARY

The Board will approve Hydro's 2024 Capital Budget in the amount of \$96,452,300 which includes expenditures of:

- \$44,232,500 which require Board approval;
- \$11,972,600 which do not require Board approval; and
- \$40,247,200 previously approved by the Board.

The Board is satisfied that the proposed expenditures for new projects/programs which require the approval of the Board are justified based on the evidence which shows that these expenditures are reasonable and necessary.

The Board approves Hydro's 2022 average rate base in the amount of \$2,334,120,000 on the basis that it complies with established practice and relevant Board Orders.

The Board also directs Hydro to file a report in its next capital budget application with respect to capital planning for the Bay d'Espoir Hydroelectric Generating Facility.

1. BACKGROUND

Section 41 of the **Act** requires a public utility to submit an annual capital budget of proposed improvements or additions to its property for approval of the Board no later than December 15th in each year for the next calendar year. A utility must also include an estimate of contributions toward the cost of improvements or additions to its property which it intends to demand from its customers.

Subsection 41(3) of the **Act** prohibits a utility from proceeding with the construction, purchase or lease of improvements or additions to its property without the prior approval of the Board where the cost of the construction or purchase or lease is in excess of the amount prescribed in the regulations. Section 3 of **Public Utilities Regulations**, NLR 40/23, sets the threshold for Board approval at \$750,000. Before this regulation was promulgated in 2023, capital expenditures in excess of \$50,000 required Board approval.

Section 78 of the **Act** gives the Board the authority to fix and determine the rate base for the service provided or supplied by a utility and also gives the Board the power to revise the rate base. Section 78 also guides the Board on the elements included in a utility's rate base.

The process and schedule to be followed for capital budget applications is set out in the Board's Capital Budget Application Guidelines (Provisional), January 2022 (the "Guidelines"). On June 12, 2023, the Board directed that the utilities' 2024 Capital Budget Applications should be filed adhering to these Guidelines. The Board conducted this proceeding pursuant to the Guidelines.

¹ The Capital Budget Application Guidelines were established in 2007. The provisional guidelines established in 2022 are being reviewed in a separate Board process.

2. APPLICATION

Newfoundland and Labrador Hydro ("Hydro") filed its 2024 Capital Budget Application with the Board on July 12, 2023 and filed revisions on August 18, 2023 and September 21, 2023 (the "Application"). The Application requested that the Board make an order:

 a) approving Hydro's 2024 capital purchases and construction projects in excess of \$750,000;

(b) approving Hydro's 2024 Capital Budget in the amount of \$96,452,300; and

(c) fixing and determining Hydro's 2022 rate base of \$2,334,120,000.

2.1. Process

Notice of the Application, including an invitation to participate, was published on July 22, 2023. Details of the Application and supporting documentation were posted on the Board's website.

 Newfoundland Power Inc. ("Newfoundland Power"), a group of industrial customers (the "Island Industrial Customer Group"), a group of communities in Labrador (the "Labrador Interconnected Group"), and the Consumer Advocate, Dennis Browne, KC (the "Consumer Advocate") intervened ("Intervenors") in the Application.

On August 8, 2023 Hydro provided an overview of the Application in a presentation to Board staff and the Intervenors. This process afforded participants with an opportunity to ask questions or raise areas of concern with respect to the Application.

The Board, Newfoundland Power, the Island Industrial Customer Group, the Labrador Interconnected Group, and the Consumer Advocate initially issued 195 Requests for Information ("RFIs") to Hydro. Hydro responded to these requests on September 11, 2023.

On September 25, 2023 Grant Thornton LLP, the Board's financial consultant, filed a report on its review of the calculation of Hydro's 2022 average rate base. The Board provided this report to the parties.

On October 5 and 6, 2023 the Board, Newfoundland Power, and the Consumer Advocate issued additional 43 RFIs related to the Application. Hydro responded to these requests on October 20, 2023.

Newfoundland Power and the Consumer Advocate filed written submissions on November 14, 2023. On November 15, 2023 the Island Industrial Customer Group confirmed they would not be making a submission. Hydro filed its reply submission on November 21, 2023.

² Corner Brook Pulp and Paper Limited, Braya Renewable Fuels (Newfoundland) LP and Vale Newfoundland and Labrador Limited are the members of the Island Industrial Customer Group.

³ The communities of Sheshatshiu, Happy Valley-Goose Bay, Wabush, and Labrador City are the members of the Labrador Interconnected Group.

2.2. Submissions

The Intervenors did not oppose the Application. Newfoundland Power submitted that it did not object to any proposed expenditures in the Application. The Consumer Advocate did not take issue with Hydro's 2024 Capital Budget or the projects and programs but raised four issues relating to the Guidelines, capital expenditure carryovers, asset management planning and renewable generating sources.

Hydro requested that the Board approve the Application and addressed the four issues raised by the Consumer Advocate.

3. BOARD DECISION

In considering the Application, the Board must assess whether approval of the proposals is consistent with the statutory obligations imposed on the Board and Hydro.⁴ In particular section 3(b) of the **EPCA** requires a public utility to manage and operate its facilities for the efficient production, transmission and distribution of power in a manner that would result in consumers in the province having equitable access to an adequate supply of power at the lowest possible cost, in an environmentally responsible manner, consistent with reliable service.⁵ In making its determinations, the Board balances the interests of customers and the utility to ensure reasonable levels of capital spending to provide for least-cost, environmentally responsible, reliable and safe service. The Guidelines state:

The Board considers the interests of both customers and utilities in determining whether proposed capital expenditures should be approved. Appropriate capital spending is in the interest of both customers and utilities as customers benefit from a utility which is well positioned to provide safe, reliable and adequate service and utilities benefit when the rates to be paid by customers are reasonable and just. Cost, performance and risk are among the factors considered by the Board in determining whether capital expenditures are appropriate and necessary to ensure the delivery of power to customers at the lowest possible cost consistent with reliable service.⁶

The burden of proof is on the utility to provide sufficient evidence to justify its capital budget application proposals. In accordance with the legislation, regulations and Guidelines, Hydro included information relating to the proposed 2024 Capital Budget, capital expenditures and 2022 average rate base. The Application also included specific information required to be filed in compliance with previous Board Orders including a status report on 2023 capital expenditures, an overview of future operation and capital expenditure requirements for the Holyrood Thermal Generating Station, a five-year capital plan, as well as evidence relating to deferred charges and a reconciliation of average rate base to invested capital. As required by the Guidelines, the

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⁴ Sections 37 and 54 of the **Act** and sections 3 and 4 of the **EPCA**.

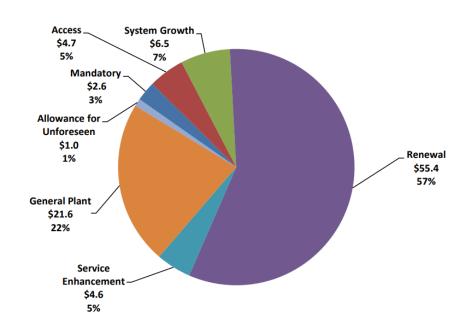
⁵ Legislative changes in May 2023 added environmental considerations to the Board's mandate.

⁶ Guidelines, pages 1-2.

Application included a prioritized list of all projects and programs organized by investment classification.

Hydro's proposed 2024 Capital Budget by investment classification is shown below.⁷

Hydro 2024 Capital Budget Proposal by Investment Classification (\$ Millions)



The Board has reviewed the Application and supporting materials, the responses to the RFIs, Grant Thornton's report and the parties' submissions. The Board's determinations in relation to the proposed capital expenditures, the 2024 Capital Budget, the 2022 average rate base and the issues raised by the Consumer Advocate are set out below.

3.1. Proposed Capital Expenditures

This is the first capital budget application filed by Hydro since the amendments to the legislation to increase the monetary threshold for expenditures requiring the prior approval of the Board to \$750,000. There are 33 proposed projects and programs over \$750,000 which require the approval of the Board.⁸ There are 51 proposed projects and programs with expenditures less than \$750,000 which do not require the approval of the Board.⁹ There are 34 projects and programs previously approved by the Board.¹⁰

The evidence provided in support of the proposed expenditures in excess of \$750,000 includes program or project descriptions, asset condition information, alternatives, justifications, risk

⁷ Application, Schedule 1, 2023 Capital Budget Overview, page 25, Chart 15.

⁸ Proposed expenditures are \$44,232,500 in 2024, \$31,823,000 in 2025 and \$4,153,100 in 2026.

⁹ Proposed expenditures are \$11,972,600 in 2024 and \$3,862,800 in 2025.

¹⁰ Proposed expenditures are \$40,247,200 in 2024, \$14,149,100 in 2025 and \$250,000 in 2026.

assessments and costing methodologies. The Application also includes engineering and technical reports. Significant additional information in relation to the proposed projects and programs was provided in response to the RFIs filed in this proceeding. The evidence also includes a description of the projects and programs with expenditures less than \$750,000.

The Board's findings with respect to the proposed Mandatory, Access, General Plant, Renewal, Service Enhancement, System Growth and Allowance for Unforeseen Items expenditures are discussed below.

3.1.1. Mandatory

Mandatory investments are those expenditures which are associated with work prescribed by a governing body such as the provincial government, the federal government or the Board. The 2024 mandatory expenditures in the amount of \$2,605,700 account for approximately 3% of Hydro's proposed 2024 Capital Budget, increased from less than 1% of Hydro's 2023 Capital Budget.

There is one mandatory project with expenditures over \$750,000 requiring the approval of the Board. This project involves the refurbishment an oil storage tank at the Holyrood Thermal Generating Station with expenditures of \$1,920,000 in 2024.¹¹ Based on the evidence the inspection of Tank 4, which was last inspected in 2010, is necessary in 2024 to satisfy the requirements of the Certificate of Approval issued by the provincial government.

 There is also one mandatory project which does not require the approval of the Board with total expenditures of \$91,600 in 2024 and \$429,000 in 2025. ¹² In addition the mandatory expenditures include a project previously approved by the Board with expenditures in the amount of \$594,100 in 2024. ¹³

The Board is satisfied that Hydro's proposal to refurbish fuel oil storage Tank 4 at the Holyrood Thermal Generating Station is required to comply with provincial regulations. The Board accepts the mandatory expenditures associated with the project approved in a previous capital budget application on the basis that the evidence confirms that there have been no material changes in the scope, nature or magnitude of this project. The Intervenors did not oppose the mandatory expenditures and did not provide any specific comments on these expenditures. The Board finds that the proposed mandatory expenditures are required to enable Hydro to meet its obligation to comply with provincial regulations.

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¹¹ Refurbish Fuel Oil Storage Tank (2024)-Holyrood.

¹² Application, Proposals Under \$750,000, page 6.

¹³ Application, 2024 Capital Budget Overview, Appendix B.

3.1.2. Access

Investments in access are those required to meet Hydro's obligation to provide customers with access to electricity services. The 2024 access expenditures of \$4,742,700 account for approximately 5% of Hydro's proposed 2024 Capital Budget similar to Hydro's 2023 Capital Budget.

There is one access program with expenditures over \$750,000 requiring the approval of the Board. This program is to provide service connections and street lights with proposed expenditure of \$4,272,000 in 2024. This is an annual allotment for new service connections and street lights based on past expenditures and forecasted activity within the Central, Northern, and Labrador regions.

There is also one program which does not require the approval of the Board with expenditures of \$470,700 in 2024.¹⁵ There are no access expenditures for projects or programs previously approved by the Board.

 The Board is satisfied that Hydro's access expenditures are necessary to address Hydro's obligation to connect new customers. The Intervenors did not oppose the access expenditures and did not provide any specific comments on these expenditures. The Board finds that the proposed access expenditures are required to enable Hydro to meet its obligation to provide customers with access to electricity services.

3.1.3. General Plant

General Plant investments are related to assets which are not part of the generation, transmission, and distribution systems used by Hydro to support its daily business and operational activities. The 2024 general plant expenditures of \$21,582,200 account for approximately 22% of Hydro's proposed 2024 Capital Budget, increased from approximately 11% of Hydro's 2023 Capital Budget.

There are nine general plant projects/programs with expenditures over \$750,000 requiring the approval of the Board. The proposed expenditures for these projects/programs are \$5,932,400 in 2024, \$9,239,800 in 2025 and \$15,500 in 2026. These projects/programs include expenditures for vehicles and mobile equipment, buildings and structures and technology and telecontrol assets.

 Expenditures of \$2,556,700 in 2024, \$5,590,300 in 2025 and \$15,500 in 2026 are proposed for four projects and two programs for <u>vehicles and mobile equipment</u>. ¹⁶ Based

¹⁴ Provide Service Extensions (2024).

¹⁵ Application, Proposals Under \$750,000, page 1.

¹⁶ Replace Light-Duty and Heavy-Duty Vehicles (2024-2026), Replace Mobile Equipment (2024-2025), Purchase 50' Material Handler Aerial Device on Tracked Unit (2024-2026)-Happy Valley Goose Bay, and Replace Grader Unit V9829(2024)-Bay d'Espoir.

on the evidence these expenditures will allow Hydro to replace 30 light-duty and 8 heavy-duty motor vehicles as well as mobile equipment based on established replacement criteria.

- Expenditures of \$296,400 in 2024 and 2,858,600 in 2025 are proposed for two projects for <u>buildings and structures</u>.¹⁷ These expenditures will allow roof replacement and building envelope refurbishment based on the age of the structure and condition assessment findings.
- Expenditures of \$3,079,300 in 2024 and \$790,900 in 2025 are proposed for three projects/programs to upgrade information and operational technology, and telecontrol assets.¹⁸ These expenditures will address obsolescence and keep information and operational technology and communications assets current to maintain reliability, security and continued vendor support.

There are also 23 general plant projects/programs which do not require the approval of the Board with total expenditures of \$4,583,600 in 2024 and \$1,274,900 in 2025. ¹⁹ In addition the general plant expenditures include 11 projects/programs previously approved by the Board in the amount of \$11,066,200 in 2024 and \$1,363,200 in 2025. ²⁰

The Board notes that the proposed general plant investment is higher in 2024 than it was last year but is satisfied that these expenditures are necessary to maintain and upgrade assets in support of Hydro's operations. The Board accepts the general plant expenditures associated with projects/programs approved in previous capital budget applications on the basis that the evidence in this Application confirms that there have been no material changes in the scope, nature or magnitude of these projects/programs. The Intervenors did not oppose the general plant expenditures and did not provide any specific comments on these expenditures. The Board finds that Hydro's proposed general plant expenditures are justified, appropriate and necessary to ensure the delivery of power to its customers at the lowest possible cost, in an environmentally responsible manner, consistent with reliable service.

3.1.4. Renewal

 Renewal investments are those which are required to replace or refurbish system assets to maintain the ability to provide customers with their current electricity services. The 2024 renewal expenditures of \$55,354,900 account for approximately 57% of Hydro's proposed 2024 Capital Budget, decreased from 70% of Hydro's 2023 Capital Budget.

There are nineteen renewal projects/programs with expenditures over \$750,000 requiring the

¹⁷ Replace Powerhouse 1 Roof (2024-2025)-Bay d'Espoir, and Refurbish Outbuilding and Powerhouse Building Envelopes (2024-2025)-Holyrood.

¹⁸ Perform Software Upgrades and Minor Enhancements (2024), Replace VHF Radio System (2024-2025), and Replace MDR8000 Microwave Radios (2024-2025).

¹⁹ Application, Proposals Under \$750,000, pages 1 to 5. The six tools and equipment programs are combined into two programs in this list.

²⁰ Application, 2024 Capital Budget Overview, Appendix B.

approval of the Board with expenditures of \$29,741,200 in 2024, \$20,141,400 in 2025 and \$3,902,300 in 2026. These expenditures relate to condition assessments, equipment overhauls, in-service failures, and asset refurbishment or replacement.

• Expenditures of \$7,723,000 in 2024 are proposed for two <u>condition assessment</u> programs. ²¹ These condition assessments are part of long-standing programs which allow Hydro to identify damaged or deteriorated components that are at risk of failure at the Holyrood Thermal Generating Station and on its wood pole transmission system.

Expenditures of \$6,010,600 in 2024 are proposed for two <u>equipment overhaul</u> programs.²² These programs involve expenditures on routine maintenance and overhauls to keep Hydro's thermal equipment in reliable operating condition. The overhaul cycles are consistent with the original equipment manufacturer's recommendations, generally follow a usage-based schedule and reflect observations in previous overhauls.

• Expenditures of \$10,654,100 are proposed for four programs to address <u>in-service failures</u>. ²³ The in-service failures programs address circumstances which require Hydro to refurbish or replace equipment immediately because it has failed, is about to fail or has deteriorated more quickly than anticipated. The work is identified through preventive maintenance programs using various condition-based assessments and testing procedures. The proposed expenditures are based on the age and service history of the equipment and a three-year history of spending for in-service failures, adjusted for current labour and material costs and other factors.

Expenditures of \$5,353,500 in 2024 and \$20,141,400 in 2025 and \$3,902,300 in 2026 are proposed for eleven projects/programs to <u>refurbish or replace</u> assets that are deteriorated, at the end of their service life or are obsolete. ²⁴ These projects and programs involve work that has been identified based on age, condition assessment, industry standards and environmental regulations. The refurbishment and/or replacement of these assets is supported based on concerns about performance, reliability, physical condition, the availability of parts and compliance with environmental regulations and industry standards.

 There are also twenty-two renewal projects/programs which do not require the approval of the Board with total expenditures of \$6,368,400 in 2024 and \$1,773,000 in 2025.²⁵ In addition the renewal expenditures include 16 projects/programs previously approved by the Board in prior

²¹ The Boiler Condition Assessment and Miscellaneous Upgrades (2024)-Holyrood, and Wood Pole Line Management Program (2024).

²² Overhaul Unit 1 Turbine, Valves and Generator (2024)-Holyrood; and Overhaul Diesel Units (2024).

²³ Distribution System In-Service Failures, Miscellaneous Upgrades, and Street Lights (2024), Thermal In-Service Failures (2024), Hydraulic In-Service Failures (2024), and Terminal Station In-Service Failures (2024).

²⁴ Replace Diesel Gensets (2024-2026), Upgrade Power Transformers (2024-2025), Replace Protective Relays (2024-2025), Renew Circuit Breakers (2024-2025), Renew Distribution Feeders (2024-2045), Replace Disconnects (2024-2025), Replace Instrument Transformers (2024-2025), Refurbish Intake 1 (2024-2025)-Bay d'Espoir, Flatten Downstream Slope (2024-025)-Hinds Lake, Refurbish Surge Tank 1(2024-2025)-Bay d'Espoir, and Replace Power Line Carrier (2024-2025)-TL247.

²⁵ Application, Proposals Under \$750,000, pages 6 to 12.

capital budget applications in the amount of \$19,245,300 in 2024, \$6,835,300 in 2025 and \$250,000 in 2026.²⁶

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The Board notes that renewal expenditures continue to make up the majority of Hydro's capital expenditures though they are lower in 2024 than they were in 2023. The Board accepts that Hydro's renewal-driven capital investment aims largely to sustain current system-level reliability as its assets age. The Board is satisfied based on the evidence that approval of the proposed renewal expenditures is necessary to allow Hydro to assess, replace and refurbish system assets to support the continued provision of safe and reliable electric service. The Board accepts the renewal expenditures associated with projects and programs approved in previous capital budget applications on the basis that the evidence confirms that there have been no material changes in the scope, nature or magnitude of these projects/programs. The Board notes that the Intervenors did not oppose the renewal expenditures and did not offer any specific comments on the renewal projects or programs. The Board is satisfied that the proposed expenditures for the renewal projects and programs appropriately balance the need for Hydro to maintain its system while minimizing the costs to be funded by its customers. The Board finds that Hydro's proposed renewal expenditures are justified, appropriate and necessary to ensure the delivery of power to customers at the lowest possible cost, in an environmentally responsible manner, consistent with reliable service.

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3.1.5. Service Enhancement

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Service enhancement investments are those which modify Hydro's system to meet operational requirements more efficiently or effectively, involving year over year projects/programs associated with safety, environmental protection, automation, and poorly performing feeders. The 2024 service enhancement expenditures of \$4,618,900 account for approximately 5% of Hydro's proposed 2024 Capital Budget capital expenditures, decreased from approximately 10% of Hydro's 2023 Capital Budget.

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There are two service enhancement projects/programs with expenditures over \$750,000 requiring the approval of the Board with expenditures of \$1,366,900 in 2024, \$2,441,800 in 2025 and \$235,300 in 2026. These expenditures relate to distribution feeders and meters.

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• Expenditures of \$1,064,300 in 2024 and \$2,227,400 in 2025 are proposed to upgrade Hydro's worst performing <u>distribution feeders</u>. ²⁷ This work is to refurbish a distribution feeder in the L'Anse-au-Loup Distribution System which has been prioritized through the examination of reliability performance data and recent condition assessments.

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 Expenditures of \$302,600 in 2024, \$214,400 in 2025 and \$235,300 in 2026 are proposed to replace meters.²⁸ This work involves the replacement of obsolete meters and associated test switches which are manually read with industrial meters with demand,

²⁶ Application, 2024 Capital Budget Overview, Appendix B.

²⁷ Upgrade of Worst Performing Distribution Feeders (2024-2025).

²⁸ The Automate Bulk Metering (2024-2026).

load profile, and remote communications capabilities and network connection to facilitate remote reading which will improve accuracy and provide potential cost savings.

There are also four service enhancement projects/programs which do not require the approval of the Board with total expenditures of \$458,300 in 2024 and \$385,000 in 2025.²⁹ In addition the 2024 service enhancement expenditures include three projects/programs previously approved by the Board in the amount of \$2,793,700 in 2024.³⁰

The Board notes that Hydro's proposed service enhancement expenditures are intended to address distribution system reliability risks and operational efficiency. The Board is satisfied that the approval of the proposed service enhancement expenditures would allow Hydro to meet operational requirements more efficiently and effectively. The Board accepts the service enhancement expenditures associated with projects/programs approved in previous capital budget applications on the basis that there have been no material changes in the scope, nature or magnitude of these projects/programs. The Intervenors did not oppose the service enhancement expenditures and did not provide any specific comments on these expenditures. The Board finds that Hydro's proposed service enhancement expenditures are justified, appropriate and necessary to ensure the delivery of power to its customers at the lowest possible cost, in an environmentally responsible manner, consistent with reliable service.

3.1.6. System Growth

System growth investments are those which modify Hydro's system to meet forecast changes in customer electricity resource requirements. The 2024 system growth expenditures of \$6,547,900 account for approximately 7% of the 2024 Capital Budget, increased from approximately 3% in Hydro's 2023 Capital Budget.

There are no new system growth projects or programs proposed in the Application. The system growth expenditures are made up of three projects which were previously approved by the Board in prior capital budget applications with expenditures of \$6,547,900 in 2024 and \$5,950,600 in 2025.³¹

The Board notes that the system growth expenditures are associated with the continuation of previously approved projects to address load growth in Labrador West. The Board accepts these expenditures on the basis that the evidence in this Application confirms that there have been no material changes in the scope, nature or magnitude of these projects. The Intervenors did not oppose the system growth expenditures and did not provide any specific comments on these expenditures. The Board finds that Hydro's proposed system growth expenditures are justified, appropriate and necessary to ensure the delivery of power to its customers at the lowest possible cost, in an environmentally responsible manner, consistent with reliable service.

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²⁹ Application, Proposals Under \$750,000, page 13.

³⁰ Application, 2024 Capital Budget Overview, Appendix B.

³¹ Application, 2024 Capital Budget Overview, Appendix B.

3.1.7. Allowance for Unforeseen Items

The Application proposes a \$1,000,000 Allowance for Unforeseen Items in 2024. This allowance will permit Hydro to proceed with unbudgeted capital expenditures so that it can respond expeditiously to events affecting the electrical system. This allowance is consistent with the amount approved in Hydro's previous capital budget applications and accounts for approximately 1% of its 2024 Capital Budget. The Intervenors did not oppose the proposed Allowance for Unforeseen Items. The Board finds that Hydro's proposed Allowance for Unforeseen Items will facilitate the provision of least-cost reliable and safe service, in an environmentally responsible manner, by enabling Hydro to respond expeditiously to unexpected events that may adversely affect the electrical system.

3.2. Proposed 2024 Capital Budget

Hydro's proposed 2024 Capital Budget is \$96,452,300 which includes expenditures of \$44,232,500 requiring Board approval, \$11,972,600 not requiring Board approval and \$40,247,200 previously approved by the Board.

While Hydro's proposed 2024 Capital Budget is higher than its 2023 Capital Budget of \$90,828,700, the Board accepts that Hydro took deliberate action to reflect a level of investment that appropriately balances reliability and cost concerns in light of increasing rate pressures and other planned capital work.³² Based on the evidence Hydro's utility asset management practices aim to reduce investment to the minimum capital level which is prudent and does not compromise customer reliability, safety or environment.³³ The Board notes that Hydro reviewed previously approved multi-year projects/programs to identify opportunities for budget refinement and, as a result, multi-year projects/programs with expenditures in 2024 were reduced by \$8.1 million.³⁴ Hydro also evaluated all ongoing projects to determine whether deferral was an option resulting in the deferral of other capital expenditures totalling approximately \$10.5 million.³⁵

As already discussed the Board has found that the proposed 2024 expenditures in excess of \$750,000 for the construction, purchase or lease of improvements or additions to Hydro's property are reasonable and justified. The Board has also accepted the expenditures associated with projects and programs previously approved by the Board based on the evidence confirming that there have been no material changes in the scope, nature or magnitude of these projects and programs. While expenditures under \$750,000 do not require approval of the Board under subsection 41(3) of the Act, they are included in Hydro's proposed 2024 Capital Budget which requires the approval of the Board pursuant to subsection 41(1) of the Act. The Board has reviewed the information provided in relation to these expenditures and accepts that they should

³² Hydro Submission, pages 1 to 2.

³³ 2024 Capital Budget Overview, page 1.

³⁴ \$6.2 million was moved to future years and the remainder was eliminated from the budget. 2024 Capital Budget Overview, page 23.

³⁵ 2024 Capital Budget Overview, Table 6, page 19.

be included in Hydro's 2024 Capital Budget. The Board is satisfied that the approval of Hydro's 2024 Capital Budget is appropriate to ensure that Hydro can continue to provide service that is reasonably safe and adequate and just and reasonable as required by section 37 of the **Act**. The Board believes that Hydro's proposed 2024 Capital Budget represents a reasonable balance of costs and reliability. The Board notes that the Intervenors did not oppose the approval of Hydro's 2024 Capital Budget. The Board finds that the proposed 2024 Capital Budget in the amount of \$96,452,300 is justified, reasonable and necessary to ensure the delivery of power to customers at the lowest possible cost, in an environmentally responsible manner, consistent with reliable service.

3.3. Average Rate Base

The Application requested that the Board fix and determine Hydro's 2022 average rate base in the amount of \$2,334,120,000.

Computation of Average Rate Base for the Year Ended December 31, 2022 (\$000s)

·· ,	2022
Total Capital Assets	\$2,186,606
Deduct Items Excluded from Rate Base	
Work in Progress	(22,755)
Asset Retirement Obligations (net of amortization)	(2,734)
Net Capital Assets	2,161,117
Net Capital Assets, Previous Year	2,165,756
Unadjusted Average Capital Assets	2,163,437
Deduct	
Average Net Capital Assets Excluded from Rate Base	(8,628)
Average Capital Assets	2,154,809
Cash Working Capital Allowance	10,312
Fuel Inventory	70,512
Supplies Inventory	38,856
Average Deferred Charges	59,632
Average Rate Base at Year-End	\$2,334,120

Grant Thornton reviewed Hydro's proposed average rate base for 2022 and concluded that the proposed 2022 average rate base accords with established practice and relevant Board Orders.

The Board notes that the proposed 2022 rate base reflects the impacts of the Holyrood Thermal Generating Station Unit 2 transformer replacement which was completed under the Allowance for Unforeseen Items account.³⁶ The Board has reviewed the final report related to this

³⁶ Order No. P.U. 34(2021).

replacement and is satisfied that it is appropriate for the associated expenditures to be included in Hydro's 2022 average rate base.³⁷ The Intervenors did not comment on Hydro's proposed 2022 average rate base or the expenditures relating to the Holyrood Thermal Generating Station Unit 2 transformer replacement. The Board fixes and determines Hydro's average rate base for 2022 in the amount of \$2,334,120,000.

3.4. Other Issues

The Board notes that while the Intervenors did not object to the approval of the Application, the Consumer Advocate commented on four other issues.

3.4.1. Provisional Capital Budget Guidelines

The Consumer Advocate submitted that the Board's provisional Capital Budget Guidelines must be finalized to ensure benefits to consumers are maximized and that changes in asset management practices are consistent with industry changes and best practices emerging in other jurisdictions.

In its reply, Hydro noted that the process to finalize the Guidelines is underway in a process separate from this Application.

The Board notes that the current Guidelines were established provisionally in January 2022 and are the subject of an ongoing separate Board process which involves other parties not participating in this Application. The Guidelines are not an issue in this proceeding and will continue to be addressed in a separate process with the participation of all interested parties.

3.4.2. Carryovers

The Consumer Advocate submitted that Hydro's asset management practices and execution continue to be problematic and urged the Board to encourage Hydro to address project execution issues to ensure certainty of supply for customers. The Consumer Advocate pointed out that Hydro will carry over approximately \$40,000,000 of capital work planned for 2022 and noted similar carryovers for the last 10 years. In the Consumer Advocate's view this is concerning at a time when there is significant uncertainty relating to the province's electricity supply.

In its reply, Hydro stated that the causal factors for capital expenditure carryovers are varied and must be considered when assessing the impact of carryovers on system reliability. Hydro explained that approximately half of the reported carryovers were due to changes in cash flow within the schedule for multi-year projects and have no impact on the asset in-service date or system reliability. The remaining carryovers were generally due to supply chain constraints outside of Hydro's control or due to strategic decisions made in the best interest of ratepayers

³⁷ "Holyrood Thermal Generation Station Transformer T2 Failure – Final Report," Newfoundland and Labrador Hydro, February 8, 2022.

and system reliability. According to Hydro carryovers cannot be fully avoided, given the size and complexity of its capital program. Hydro submitted that it has successfully minimized the impacts of carryovers on system reliability.

The Board accepts that carryovers are an inevitable part of any capital program and good planning and oversight are critical to provide for well managed capital execution to minimize cost escalation and impacts on subsequent year project execution. The evidence filed in this Application demonstrates that the 2022 carryovers in the amount of \$39,990,800, included \$15,310,000 attributed to the strategic deferral of work on five items, \$13,635,000 related to supply chain issues and \$8,756,000 associated with delays in the environmental assessment process.³⁸ The Board accepts Hydro's explanation for the strategic deferral of expenditures based on updated asset condition information, updated electrical system planning requirements, and revised project execution plans within multi-year projects. The Board is also satisfied that the remainder of 2022 carryovers were largely beyond Hydro's control being related primarily to supply chain issues and delayed project approval by outside agencies. The Board is satisfied that it is not necessary based on the evidence in this proceeding to provide direction to Hydro with respect to project execution at this time. Nevertheless the Board acknowledges Hydro's high levels of carryovers in recent years and believes that continued oversight is required with respect to this issue. The Board will continue to monitor Hydro's carryovers to determine whether Hydro should be directed in the future to take any specific additional actions.

3.4.3. Asset Management Plan for Bay d'Espoir

The Consumer Advocate submitted that Hydro should develop an overall asset management plan for the refurbishment of the Bay d'Espoir Hydroelectric Generating Facility to ensure it can be relied on to provide reliable supply to customers and to assess if it makes sense to continue to refurbish the plant or embark on an option to replace the capacity and energy it supplies. The Consumer Advocate submitted that without an overall asset management plan for Bay d'Espoir the parties and the Board cannot know if it makes economic sense to continue to refurbish the plant or embark on an option to replace the capacity and energy it supplies.

In its reply, Hydro submitted that its asset management plans for hydraulic generating assets are tailored to each asset, enable fulsome evaluation of asset condition and prudent and informed decision-making. According to Hydro an overall condition assessment, such as that undertaken for the Holyrood Thermal Generating Station in 2021–2022, is not necessary or beneficial for making informed and prudent asset management decisions about its hydraulic generating assets at Bay d'Espoir. Hydro submitted that the sustaining capital investments proposed in the Application are necessary and expected to realize the design life of the Bay d'Espoir Facility.

 The Board notes that the Bay d'Espoir Facility is a critical hydraulic generating asset. Significant capital expenditures are proposed for this facility in 2024 and significant additional expenditures are planned for future years. In addition Hydro is currently investigating the potential expansion

³⁸ PUB-NLH-076, Attachment 1. The remaining expenditures were \$2,289,800.

of this facility and this will be addressed as a part of the Board's ongoing Reliability and Resource Adequacy Review. The Board also notes that Hydro is conducting an asset management review which will address all of its assets including Bay d'Espoir. It may be some time before these reviews are completed and a new approach to asset management for Bay d'Espoir is developed. As a result the Board believes it is premature to direct Hydro to develop an asset management plan for the refurbishment of the Bay d'Espoir Facility. The Board does believe, however, that it would be helpful for Hydro to include in its next capital budget application a report setting out its capital plan for the Bay d'Espoir Facility addressing anticipated and potential work and expenditures over the 2025-2034 period.

3.4.4. Variability and Non-Dispatchability of Renewable Generation Sources

The Consumer Advocate submitted that the Board should direct Hydro and/or Newfoundland Power to gain a better understanding of the integration of non-dispatchable resources, non-wires alternatives, behind-the-meter generation and the role of "prosumers" in meeting the future electricity of the province. The Consumer Advocate expressed concern that Hydro is conducting a Reliability and Resource Adequacy Study without information on how other North American utilities plan on combining non-dispatchable resources with other generation resources. In the Consumer Advocate's view government net-zero carbon efforts are likely to make customerowned generation and battery storage economically viable options as fossil fuels are ruled out as potential supply options. The Consumer Advocate also noted that uncertainty in the reliability of supply to the Island Interconnected System is likely to increase interest in customer-owned generation and battery storage.

 In its reply Hydro submitted that it is giving full consideration to all viable sources of capacity and energy through its Reliability Adequacy Plan. Hydro noted that during 2023 it has filed studies with the Board addressing wind integration, battery energy storage systems, and pumped storage at its existing reservoirs. Hydro has also submitted plans to file a study into the viability of pumped storage at greenfield sites during 2024. Hydro notes that as a system with low load and constrained interconnections to neighbouring systems, Hydro must evaluate generating sources within this context and that information on the integration of renewable sources in other jurisdictions provides limited value.

The Board notes that the issues raised by the Consumer Advocate with respect to renewable generation sources and net-zero carbon efforts are important ongoing issues which have ramifications beyond Hydro's 2024 Capital Budget Application. These issues are a significant part of the ongoing Reliability and Resource Adequacy Review and will come to the forefront in future capital planning for utilities in the province as the technology continues to develop and become more widely accepted. The Board believes that it would be premature and inappropriate to direct Hydro as a part of this Application to study the issues raised by the Consumer Advocate with respect to variability and non-dispatchability of renewable generation sources.

4. BOARD ORDER

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IT IS THEREFORE ORDERED:

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Hydro shall pay all costs and expenses of the Board incurred in connection with the Application.

Hydro's proposed construction and purchase of improvements or additions to its property in excess of \$750,000 to be completed in 2024, as set out in Schedule A to this Order, are approved.

2) Hydro's proposed multi-year construction and purchase of improvements or additions to its property in excess of \$750,000, as set out in Schedule B to this Order, are approved.

- 3) Hydro's proposed 2024 Capital Budget for improvements or additions to its property in the amount of \$96,452,300, as set out in Schedule C to this Order, is approved.
- 4) Hydro's proposed average rate base for the year ended December 31, 2022 is hereby fixed and determined at \$2,334,120,000.
- 5) Unless otherwise directed by the Board Hydro shall file with, its 2025 Capital Budget Application, a report in relation to the Holyrood Thermal Generating Station addressing the continued operation of the facility until the later of March 31, 2030 or the anticipated conclusion of generation operations.
- Unless otherwise directed by the Board Hydro shall file, with its 2025 Capital Budget 6) Application, a report in relation to the Bay d'Espoir Hydroelectric Generating Facility addressing its capital plan for this facility over the 2025-2034 period.
- 7) Unless otherwise directed by the Board, Hydro shall file a report on its 2024 capital expenditures by April 1, 2025.
- 8) Unless otherwise directed by the Board Hydro shall provide, in conjunction with its 2025 Capital Budget Application, a status report on the 2024 capital expenditures showing for each project:
 - i. the approved budget for 2024;
 - the expenditures prior to 2024; ii.
 - iii. the 2024 expenditures to the date of application;
 - the remaining projected expenditures for 2024; iv.
 - the variance between the projected total expenditures and the approved budget; v.
 - vi. an explanation of the variance.

DATED at St. John's, Newfoundland and Labrador this 21st day of December 2023.

Đwanda Newman, LL.B.

Vice-Chair

John O'Brien, FCPA, FCA, CISA

Commissioner

Christopher Pike, LL.B., FCIP

Commissioner

Jo-Anne Galarneau

Executive Director and Board Secretary

Newfoundland and Labrador Hydro 2024 Capital Budget Single-Year Projects Over \$750,000 (\$000)

			<u>2024</u>
Access			
Provide Service Extensions (2024)	4,272.0		
Total Access	1,272.0	\$	4,272.0
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<u>Mandatory</u>			
Refurbish Fuel Oil Storage Tank 4 (2024) - Holyrood	1,920.0		
Total Mandatory		\$	1,920.0
Allowance for Unforeseen			
Allowance for Unforeseen Items (2024)	1,000.0		
Total Allowance for Unforeseen		\$	1,000.0
Renewal			
Thermal In-Service Failures (2024)	3,508.7		
Terminal Station In-Service Failures (2024)	1,300.0		
Hydraulic In-Service Failures (2024)	1,500.0		
Distribution System In-Service Failures, Miscellaneous Upgrades, and Street Lights (2024)	4,345.4		
Overhaul Diesel Units (2024)	829.2		
Boiler Condition Assessment and Miscellaneous Upgrades (2024) - Holyrood	3,957.8		
Overhaul Unit 1 Turbine Valves and Generator (2024) - Holyrood	5,181.4		
Wood Pole Line Management (2024)	3,765.2		
Total Renewal		\$	24,387.7
General Plant			
Replace Grader Unit V9829 (2024) - Bay d'Espoir	836.7		
Perform Software Upgrades and Minor Enhancements (2024)	864.2		
Total General Plant		\$	1,700.9
Total Expenditures Single-Year Projects over \$750,000		\$	33,280.6

Newfoundland and Labrador Hydro 2024 Capital Budget Multi-Year Projects Over \$750,000 (\$000)

Classification	Project Description	2024	2025	2026	Total
Renewal	Replace Power Line Carrier (2024-2025) - TL247	87.2	667.4		754.6
	Replace Instrument Transformers (2024–2025)	154.9	714.8		869.7
	Replace Protective Relays (2024–2025)	1,388.4	2,050.7		3,439.1
	Replace Disconnects (2024–2025)	127.4	1,358.1		1,485.5
	Upgrade Power Transformers (2024-2025)	864.6	2,711.3		3,575.9
	Flatten Downstream Slope (2024-2025) - Hinds Lake	276.1	2,953.4		3,229.5
	Refurbish Surge Tank 1 (2024-2025) - Bay d'Espoir	175.8	2,111.4		2,287.2
	Renew Circuit Breakers (2024–2025)	183.9	2,779.3		2,963.2
	Renew Distribution Feeders (2024-2025)	1,287.3	1,245.1		2,532.4
	Refurbish Intake 1 (2024-2025) - Bay d'Espoir	272.1	3,071.9		3,344.0
	Replace Diesel Gensets (2024-2026)	535.8	478.0	3,902.3	4,916.1
Service Enhancement	Automate Bulk Metering (2024-2026)	302.6	214.4	235.3	752.3
	Upgrade Worst-Performing Distribution Feeders (2024-2025)	1,064.3	2,227.4		3,291.7
General Plant	Replace MDR8000 Microwave Radios (2024-2025)	953.5	500.3		1,453.8
	Replace Powerhouse 1 Roof (2024-2025) - Bay d'Espoir	140.2	1,819.2		1,959.4
	Refurbish Outbuilding and Powerhouse Building Envelopes (2024-2025) - Holyrood	156.2	1,039.4		1,195.6
	Replace Light- and Heavy-Duty Vehicles (2024-2026)	1,479.1	4,148.8	8.4	5,636.3
	Replace VHF Radio System (2024-2025)	1,261.6	290.6		1,552.2
	Replace Mobile Equipment (2024-2025)	216.9	599.7		816.6
		24.0	841.8	7.1	872.9
	Purchase 50' Material Handler Aerial Device on Tracked Unit (2024-2026) - Happy Valley Goo	se Bay			
	Total Multi-Year Projects over \$750,000 commencing in 2024	\$ 10,951.9	\$ 31,823.0	\$ 4,153.1	46,928.0

Newfoundland and Labrador Hydro 2024 Capital Budget (000s)

Total 2024 Capital Budget	96,452.3
Multi-Year Projects/Programs previously approved by the Board prior to 2024 ³	40,247.2
Multi-Year Projects/Programs under \$750,000 commencing in 2024 ²	2,299.2
Projects/Programs Under \$750,000 to be completed in 2024 ¹	9,673.4
Multi-Year Projects/Programs over \$750,000 commencing in 2024	10,951.9
Projects/Programs Over \$750,000 to be completed in 2024	33,280.6

 $^{^{\}scriptsize 1}$ See Schedule C: Appendix 1 for details.

² See Schedule C: Appendix 2 for details.

³ See Schedule C: Appendix 3 for details.

Newfoundland and Labrador Hydro 2024 Capital Budget Single-Year Projects Under \$750,000 (\$000)

		<u>202</u>
<u>Access</u>		
Purchase Meters and Metering Equipment (2024)	470.7	
Total Access		\$ 470.
Renewal		
Gas Turbine In-Service Failures (2024)	358.0	
Transmission In-Service Failures (2024)	158.5	
Penstock Level II Condition Assessment (2024) - Upper Salmon	382.8	
Diesel In-Service Failures (2024)	488.3	
Replace 48 V Battery Banks and Chargers (2024)	422.2	
Purchase Mobile Devices (2024)	155.6	
Upgrade Remote Terminal Units (2024)	165.9	
Overhaul Hydraulic Units (2024)	323.8	
Replace Timber Crib and Insulation (2024) - Burnt Dam Spillway	161.8	
Overhaul Pumps (2024) - Holyrood	661.0	
Overhaul Marine Terminal Loading Arms (2024) - Holyrood	511.0	
Inspect Fuel Tanks (2024) - Hardwoods Gas Turbines	692.9	
Telecommunications In-Service Failure (2024)	91.4	
Total Renewal		\$ 4,573.
ervice Enhancement		
Remove Safety Hazards (2024)	198.3	
Install Anemometer (2024) - Cat Arm	68.6	
Total System Enhancement		\$ 266.
General Plant		
Purchase Office Equipment Less Than \$50,000 (2024)	50.0	
Purchase Tools and Equipment Less than \$50,000 (2024) - Gas Turbine	18.6	
Purchase Tools and Equipment Less than \$50,000 (2024) - Hydraulic Plants	209.4	
Purchase Tools and Equipment Less than \$50,000 (2024) - Thermal Plants	167.1	
Replace Network Communications Equipment (2024)	180.7	
Purchase Tools and Equipment Less than \$50,000 (2024) - Central Region	188.2	
Purchase Tools and Equipment Less than \$50,000 (2024) - Northern Region	97.0	
Purchase Tools and Equipment Less than \$50,000 (2024) - Labrador Region	120.1	
Upgrade Energy Management System (2024)	366.4	
Purchase Personal Computers (2024)	555.9	
Replace Peripheral Infrastructure (2024)	276.8	
Upgrade Core OT Infrastructure (2024)	174.7	
Purchase Tools and Equipment Less than \$50,000 (2024) - Telecontrol	45.6	
Replace SONET Multiplexors (2024)	430.4	
Update Cyber Security Infrastructure (2024)	281.3	
Minor Telecommunications Enhancements (2024)	96.9	
Replace CCTV Cameras (2024)	317.6	
General Property Rehabilitation (2024) - Hydro Place	234.0	
Upgrade HVAC Supervisory Controllers (2024) - Hydro Place	149.6	
Upgrade SCADA Network (2024)	402.3	
Total General Plant		\$ 4,362.
Total Expenditures Single-Year Projects Under \$750,000		\$ 9,673.

Newfoundland and Labrador Hydro 2024 Capital Budget Multi-Year Projects Under \$750,000 (\$000)

Classification	Project Description	2024	2025	2026	Total
Renewal	Replace Annunciator - Phase 2 (2024-2025) - Bay d'Espoir	294.1	187.5		481.6
	Replace Terminal Station Battery Banks and Chargers (2024–2025)	71.8	120.9		192.7
	Replace Annunciator Panels (2024-2025) - Cat Arm	160.2	191.2		351.4
	Upgrade UPS 1 & 2 (2024-2025) - Holyrood	263.0	107.6		370.6
	Upgrade Unit 1 Control System (2024-2025) - Holyrood	468.3	184.3		652.6
	Upgrade DCS Hardware - Units 1 and 2 (2024-2025) - Holyrood	195.2	277.3		472.5
	Upgrade Data Alarm Systems (2024–2025) - Western Avalon Terminal Station	137.0	156.9		293.9
	Replace Circuit Breaker Reclosing Controllers (2024–2025) - TL247	112.4	215.8		328.2
	Upgrade Distribution (2024-2025) - Bay d'Espoir Terminal Station 2	93.2	331.5		424.7
Service Enhancement	Construct Maintenance Platform (2024-2025) - Holyrood Gas Turbine	130.5	228.7		359.2
	Upgrade Instrumentation (2024-2025) - Hardwoods Gas Turbine	60.9	157.2		218.1
General Plant	Replace Powerhouse 1 Air Conditioning Unit (2024-2025) - Bay d'Espoir	57.8	231.2		289.0
	Refurbish Control Building (2024-2025) - Grandy Brook and Doyles	109.4	444.7		554.1
	Install Fire Protection in 230 kV Stations (2024–2025) - Voisey's Bay	53.8	599.0		652.8
Mandatory	Upgrade Station Lighting (2024-2025) - Bottom Waters, Deer Lake, Doyles, Indian River, and Western Avalon Terminal Stations	91.6	429.0		520.6
	Total Multi-Year Projects under \$750,000 commencing in 2024	\$ 2,299.2	\$ 3,862.8	\$ 0.0	\$ 6,162.0

Newfoundland and Labrador Hydro 2024 Capital Budget Multi-Year Projects Previously Approved by the Board (\$000)

			2023 and				
Approved	Classification	Project Description	Prior	2024	2025	2026	Total
P.U. 2(2023)	Renewal	Terminal Station Renewal Program (2023-2024)	1,733.7	5,584.5			7,318.2
		Circuit Breakers Renewal Program (2023-2024)	216.9	3,595.1			3,812.0
		Install Breaker Failure Protection (2023-2024) - Sunnyside	73.5	216.2			289.7
		Diesel Genset Replacement Program (2023-2025)	819.1	174.0	1,883.1	250.0	3,126.2
		Replace Diesel Genset 1 (2023-2024) - Ebbegunbaeg	298.0	728.3			1,026.3
		Refurbish Superstructure (2023-2024) - Salmon River Spillway	328.3	2,500.0			2,828.3
		Replace Powerhouse Station Service Panel (2023-2024) - Upper Salmon	591.8	976.7			1,568.5
		Replace Oil Mist Separator (2023-2024) - Happy Valley Gas Turbine	138.5	262.1			400.6
		Major Condition Assessment and Miscellaneous Refurbishments Synchronous Condenser 1 and 2					
		(2023-2024) - Wabush Terminal Station	577.2	516.1			1,093.3
		Replace Data Alarm System Annunciators (2023) - Buchans	61.2	104.8			166.0
		Replace Circuit Breaker Reclosing Controllers (2023-2024) - Hardwoods	81.6	149.6			231.2
		Replace Intermediate Fuel Storage Tanks (2023-2024) - Nain	127.4	593.7			721.1
		Replace Power Line Carrier (2023–2024) - TL223 and TL224	105.3	852.4			957.7
	System Growth	Additions for Load Growth - Upgrade Transformer Capacity (2023-2024) - Jean Lake Terminal Station	580.0		5,436.1		6,016.1
	Service Enhancement	Upgrade of Worst-Performing Distribution Feeders (2023-2024)	73.4	1,372.6			1,446.0
		Install Oil Spill Containment Transformer T1S (2023-2024) - Cat Arm	155.1	426.5			581.6
	General Plant	Install Fire Protection in 230 kV Stations (2023-2024) - Deer Lake	79.2	535.3			614.5
		Replace Light- and Heavy-Duty Vehicles (2023-2025)	1,308.1	2,584.6	473.3		4,366.0
		Water System Condition Assessment and Upgrades (2023) - Bay d'Espoir	161.0	504.9			665.9
		Replace Building Exterior (2023-2024) - Postville	124.6	558.7			683.3
		Replace HVAC System (2023-2024) - Bishop's Falls	43.4	128.8			172.2
		Upgrade Water and Fire Suppression Systems (2023-2024) - Bishop's Falls	353.7	2,886.3			3,240.0
		Replace Diesel Shop Building (2023-2025) - Bishop's Falls	168.0	1,254.1	889.9		2,312.0
		Replace Mobile Equipment (2023-2024)	541.2	187.3			728.5
	Mandatory	Replace Terminal Station Lighting (2023-2024)	323.3	594.1			917.4
		Total Multi-Year Projects commencing in 2023	\$ 9,063.5	\$ 27,286.7	\$ 8,682.4 \$	5 250.0 \$	45,282.6

Newfoundland and Labrador Hydro 2024 Capital Budget Multi-Year Projects Previously Approved by the Board (\$000)

			2023 and				
Approved	Classification	Project Description	 Prior	2024	2025	2026	Total
P.U. 37(2021)	Renewal	Diesel Genset Replacement Unit 2012 - L'Anse-Au-Loup	2,853.1	210.2			3,063.3
		Diesel Genset Replacement Unit 2039 - St. Lewis	1,980.8				1,980.8
	Service Enhancement	Replace Metering System	4,881.2	994.6			5,875.8
	General Plant	Purchase 85' Material Handler Aerial Device on Track Unit	1,286.1	67.8			1,353.9
		Purchase 46' Material Handler Aerial Device on Track Unit	719.2	38.8			758.0
		Replace Light- and Heavy-Duty Vehicles (2022-2024)	1,162.2	2,319.6			3,481.8
		Total Multi-Year Projects commencing in 2022	\$ 12,882.6	\$ 3,631.0	\$ 0.0	\$ 0.0	\$ 16,513.6
P.U. 2(2021)	Renewal	Refurbish Ebbegunbaeg Control Structure	9,945.2	2,781.6	4,952.2		17,679.0
	System Growth	Wabush Terminal Station Upgrades	8,870.1	3,808.0			12,678.1
		Additions for Load - Wabush Substation Upgrades	7,439.7	2,739.9	514.5		10,694.1
		Total Multi-Year Projects commencing in 2021	\$ 26,255.0	\$ 9,329.5	\$ 5,466.7	\$ 0.0	\$ 41,051.2
		Total Multi-Year Projects Previously Approved by the Board	\$ 48,201.1	\$ 40,247.2	\$ 14,149.1	\$ 250.0	\$ 102,847.4