

- 1 Q. The COVID-19 pandemic has resulted in restricted movement of the general population.
- 2 i. How has this restriction impacted Hydro's ability to maintain its electrical plant within the
- 3 Island Interconnected system where distancing may not be practical?
- 4 ii. What physical distancing and other COVID-19 safeguards does Hydro plan to implement for
- 5 the projects identified within the Application and do they differ from those implemented for
- 6 the entire Island Interconnected system?
- 7 iii. Does Hydro foresee any problems with obtaining expertise from the OEMs or third-party
- 8 consultants in the work described in the Application as a result of travel restrictions and self-
- 9 isolation requirements? If so, how does Hydro plan to mitigate these risks?
- 10 A. i. Restrictions and protocols to address the COVID-19 risk are resulting in reduced productivity
- 11 of Newfoundland and Labrador Hydro's ("Hydro") workforce. During this period, Hydro is
- 12 focused on continuing the critical work required to safely maintain the operation of the
- 13 electricity systems and reliably serve customers in the present and through the next winter
- 14 season. Work is being prioritized and therefore currently executed on the basis of safety
- 15 risk, reliability risk and regulatory compliance. The workforce is being deployed to complete
- 16 the high priority work, with controls in place to protect the safety and health of the
- 17 workforce and people in the communities in which we work and travel.
- 18 Each operating and support department in Hydro has developed a business continuity plan
- 19 for the COVID-19 pandemic. The purpose of each plan is to: (1) establish contingency
- 20 measures should workers become unavailable for critical work; (2) plan for a supply of
- 21 necessary resources, including personal protective equipment; and (3) establish
- 22 preparedness measures for the prevention and control of exposure of COVID-19. These
- 23 plans are in effect.
- 24 ii. Nalcor Energy has developed several work practices and guidance documents as safeguards
- 25 against COVID-19, that are being implemented for all its work and that of its subsidiaries
- 26 including Hydro. This also applies to the project work identified within this application.
- 27 Safeguards include: a risk assessment guide for critical work, safe work practices for critical

1 work, instructions for the safe use of personal protective equipment, guidance for cleaning  
2 and disinfection, a daily health screening tool, and remote site guidelines for symptomatic  
3 employees. As the COVID-19 situation evolves and new information or requirements are  
4 made available, these are being reviewed and updated on a continuous basis. Hydro is  
5 actively monitoring information from the provincial and national health authorities, the  
6 World Health Organization, the Canadian Electricity Association and the Centre for Energy  
7 Advancement through Technological Innovation.

8 Hydro's approach is to bring only essential workers to sites and to complete daily health  
9 screening with an aim to prevent COVID-19 in the workplace and essential worker group.  
10 Shifts are split to minimize the number of workers at site at a given time and longer shifts  
11 have been implemented to facilitate constrained outage windows. Work will be completed  
12 with physical distancing where possible; personal protective equipment and other controls  
13 will be employed where physical distancing can not be assured.

14 For Hydro's capital projects with significant construction, project managers prepare a  
15 Project Safety, Health and Environmental Plan ("HSE Plan") using an established template.  
16 The HSE Plan ensures that all safety and health requirements are considered during the  
17 planning phase of a project and are brought under one cover to guide the project team. In  
18 addition to the standard HSE Protocols and guidelines, new practices are being designed to  
19 address specific requirements related to COVID-19 safeguards.

20 On March 23, 2020, Hydro temporarily stood down the mobilization of any contractors to  
21 work sites for capital projects to allow time for understanding COVID-19 risks and  
22 developing appropriate work practices and guidance documents. Prior to mobilizing any  
23 contractors to a work site, Hydro will require contractors to submit an acceptable COVID-19  
24 work plan that meets or exceeds the requirements of Hydro's established safeguards.

- 25 iii. Hydro is undertaking advanced coordination and planning with contractors to expedite  
26 execution of the project, subject to approval of the projects by the Board of Commissioners  
27 of Public Utilities; there has been no indication to date of any problems associated with  
28 obtaining the required expertise. Plans are being developed to ensure that time is allowed

1 for travel restrictions from out of province such as the mandatory self-isolation  
2 requirements. Hydro will continue to monitor public health requirements regarding travel. If  
3 key out of province expert resources are not available to travel, Hydro will utilize technology  
4 to engage experts remotely.