Q. Why is the VBNTS fire protection necessary (please include reference to any applicable standards)?

5 A. Newfoundland and Labrador Hydro ("Hydro") has a responsibility to ensure the safe and reliable operation of its assets.¹

Hydro's terminal station control buildings contain combustible materials. As these facilities are unattended, a fire could spread causing severe damage to protection and control wiring and equipment, which could cause extended outages. The restoration to normal operations for a terminal station that is severely damaged by fire could take months or longer, potentially resulting in significant business losses to customers. As the terminal station control buildings are critical to the reliable supply of power to customers, Hydro developed a plan to install automatic fire protection systems in all its 230 kV terminal stations, starting with its most critical stations as a priority. The first 230 kV terminal station control building fire protection installations were installed in Holyrood and Bay d'Espoir in 2015 and 2016, respectively. The protection system minimizes the risk of damage in the event of a fire, protecting the infrastructure and equipment that are essential to ensuring delivery of power supply—in this case, to Vale Newfoundland and Labrador Limited's Long Harbour nickel ore processing plant.

¹ Public Utilities Act, RSNL 1990, c P-47, s. 37.