

1 Q. **Newfoundland and Labrador Hydro - EFLA Consulting Engineers Report - *Structural Capacity***  
2 ***Assessment of the Labrador Island Transmission Link, April 30, 2020 (“EFLA” Report)***

3 With respect to Hydro’s cover letter for the April 30, 2020 EFLA report, describing “unsurprising”  
4 differences between the results of expert opinion in the EFLA report and that previously  
5 provided, please summarize the principal areas of divergence in the opinions being referred to,  
6 and describe the primary contributing factors in the areas summarized.

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9 A. Differences have been identified with respect to the documented return period for Segment 11  
10 (Avalon Peninsula) between the EFLA Consulting Engineer’s (“EFLA”) report and the information  
11 that was previously provided in Newfoundland and Labrador Hydro’s (“Hydro”) response to NP-  
12 NLH- 004.<sup>1</sup> NP-NLH-004 indicated that the return period for segment 11 was 500-year, as  
13 compared to the 150-year return period noted in the EFLA report.

14 Investigation is currently underway to assess the principal areas and sources of divergences  
15 between results published in the EFLA report and those provided in NP-NLH-004. Hydro will file  
16 all findings of the investigation as part of the report titled “Reliability Assessment of LIL  
17 considering Climatological Loads.” This report is being completed by Haldar & Associates Inc.  
18 and will be filed as part of Hydro’s 2020 Update to the Reliability and Resource Adequacy Study  
19 in November 2020.

20 Hydro maintains that, given the intent of the two reports to complete a benchmark against CSA,  
21 it is not surprising that there are differences in the results due to subjective decisions with  
22 respect to selected design criteria. CSA provides designers with a range of varying subjective  
23 factors that could influence results depending on the inputs selected. Preliminary findings  
24 indicate that differences presented are reflected in details in analysis of certain sections of the  
25 Labrador-Island Link only and not of the overall system.

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<sup>1</sup> The analysis used for NP-NLH-004 was completed by SNC Lavalin. The request for information was filed on January 30, 2015 as part of the Investigation and Hearing into Supply Issues and Power Outages on the Island Interconnected System proceeding.