

1 Q. On page 11 (of 74) of Attachment 1 to Newfoundland and Labrador Hydro’s (“NLH”) reply
2 document, Midgard Consulting states the following:

3 MSH [Mary’s Harbour generating station] is currently in need of several
4 outstanding upgrades to enable the facility to reach its scheduled retirement in
5 2030. The fourth station in the region, St. Lewis generating station (“SLE”), is
6 relatively new and is scheduled for retirement in 2045. The existing generating
7 stations range in age from 18 years (SLE) to 33 years (MSH) and several are
8 scheduled for refits, **including the addition of modern fire suppression systems.**
9 These refits have largely been deferred while a long-term plan for the region is
10 developed to ensure that large capital expenditures are not made for assets that
11 will be immediately retired. [Emphasis added]

12 Please identify the risk of any deferral to the addition of modern fire suppressions systems to
13 the St. Lewis and Mary’s Harbour generating stations. If there is potential risk, please provide all
14 intended interim mitigation measures.

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17 A. Newfoundland and Labrador Hydro (“Hydro”) assesses risk based on the likelihood of
18 occurrence and consequence of the occurrence, both of which are ranked on a scale of 1–5 and
19 multiplied together to derive an overall risk score. Hydro considers the likelihood of a diesel
20 generating station fire as a “2” and the consequence of a fire as a “4” for a total risk score of 8
21 (out of 25). This score represents a moderate risk.¹

22 The St. Lewis and Mary’s Harbour Diesel Generating Stations have fully functional fire detection
23 systems that alert the operators and the Energy Control Centre if a fire is detected. This alert
24 would then be communicated to the local fire department for assistance, if required.

¹ Hydro’s capital risk evaluation matrix was provided in “2024 Capital Budget Application,” Newfoundland and Labrador Hydro, rev. September 21, 2023 (originally filed July 12, 2023), sch. 1, app. G, p. G-1, <<http://www.pub.nl.ca/applications/NLH2024Capital/app/From%20NLH%20-%202024%20Capital%20Budget%20Application%20-%20Revision%20%20-%202023-09-21.PDF>>.