1 Q. Please confirm that the proposed N-2 redundancy at Charlottetown and Pinsent's Arm is a 2 temporary measure and that Hydro will revert back to N-1 redundancy for these communities 3 upon the completion of a long-term solution for the supply of power. If not, please explain why Hydro would continue using N-2 redundancy. 4

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7 Newfoundland and Labrador Hydro's "Long-Term Supply for Southern Labrador –Phase 1" A. application notes that a redundancy requirement of N-2 is required to prevent the reliability of southern Labrador from decreasing following the interconnection of the region.¹ This is discussed further in Hydro's response to PUB-NLH-030 of that application, attached as PUB-NLH-

11 001, Attachment 1.

¹ "Long-Term Supply for Southern Labrador – Phase 1," Newfoundland and Labrador Hydro, July 16, 2021, sch. 1, att. 1, app. C.

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1	Q.	Refe	Reference: Attachment 1 - Long-Term Supply for Southern Labrador - Economic and Technical		
2		Asso	essment: Appendix C – Southern Labrador Interconnection – Reliability Assessment		
3		Hyd	ro states on page 6 that "A southern Labrador interconnection would improve the overall		
4		syst	em performance of the southern Labrador isolated diesel systems as long as the regional		
5		dies	el plant has a redundancy of N-2."		
6			a) What is the incremental cost to this proposal as a result of implementing this N-2		
7			redundancy as opposed to Hydro's typical N-1 redundancy?		
8			b) Is the use of N-2 redundancy a commonly accepted industry practice?		
9			c) Is Hydro proposing that N-2 redundancy become the new rural planning standard for		
10			rural isolated systems?		
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12					
13	A.	a)	A redundancy requirement of N-2 is required to prevent the reliability of southern Labrador		
14			from decreasing following the interconnection of the region. A detailed Class 2 estimate		
15			was not developed for the option of N-1 redundancy as it was considered less reliable than		
16			the existing configuration; however, as a high-level approximation, Newfoundland and		
17			Labrador Hydro ("Hydro") believes that moving to an N-1 redundancy would reduce the		
18			capital cost by approximately \$2.5 million. ²		
19		b)	Of the other utilities who are members of the Off Grid Utilities Association ³ ("OGUA"), most		
20			have adopted a standard redundancy planning criteria of N-1 but there are many examples		
21			where additional redundancy is used. Some examples include:		

¹ "Long-Term Supply for Southern Labrador – Phase 1," Newfoundland and Labrador Hydro, July 16, 2021, sch. 1, att. 1, app. C. ² Based on the following savings: Genset \$1.67 million (including installation), Electrical \$0.05 million, Building \$0.35 million,

Protection, Control and Communication (\$0.48 million). Estimate does not include savings associated with reduced contingency or interest during construction.

³ Members of OGUA include ATCO Yukon, Hydro Quebec, BC Hydro, Manitoba Hydro, Quilliq Energy, ATCO Alberta, Cordova Electric Cooperative, and AVEC.

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1		 Manitoba Hydro uses N-2 redundancy given the very remote nature of its four
2		isolated sites;
3		 ATCO Yukon uses N-2 redundancy for its largest six generator sites where parallel
4		operation of two or more units are required to provide community load. (similar to
5		Hydro's proposed southern Labrador interconnection);
6		 ATCO Alberta used N-2 redundancy for its largest diesel plant that has four
7		generating units; and
8		 Cordova Electric Cooperative strives to maintain N-2 redundancy.
9	c) Hy	ydro is not proposing that N-2 redundancy become the new rural planning standard for
10	ru	ral isolated systems. As described in part a) of this response, the use of N-2 redundancy is
11	re	quired for the southern Labrador interconnected system to ensure the reliability does not
12	de	ecline due to the introduction of the distribution interconnection lines.