

1 Q. **Reference: Application, 2023 Capital Budget Overview, page 23/24**

2 a) Does Hydro’s terminal station lighting contain PCBs?

3 b) Given the energy and operating efficiencies of LED lighting available in the market today,  
4 and the potential for harmful PCBs in existing lighting, why has Hydro not proposed a  
5 program to replace all station and office lighting inside and outside its buildings (similar to  
6 the LED Street Lighting Program)?

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9 A. a) In 2021, Newfoundland and Labrador Hydro (“Hydro”) completed a survey of its terminal  
10 station lighting to identify light fixture types, manufacturers, and year of manufacturer that  
11 were known to contain polychlorinated biphenyls (“PCB”). This survey identified 13 terminal  
12 stations as having light ballasts that could potentially contain PCBs. Of these 13 terminal  
13 stations, 8 are planned to have lighting replaced in 2023–2024 and 5 are planned to have  
14 lighting replaced in 2024–2025. Lighting equipment is not equipped with oil sampling ports;  
15 therefore, testing for PCBs is considered destructive testing. These units will be assumed to  
16 contain PCBs and once removed will be disposed of accordingly.

17 b) A large portion of the interior and exterior lighting at Hydro’s sites have already been  
18 retrofitted to more modern and efficient technologies over the last ten years, under Hydro's  
19 Internal Energy Efficiency Program (“IEEP”). The IEEP did not specifically target light fixtures  
20 that contained PCBs; however, they were often the oldest vintage fixtures and least efficient  
21 and thus targeted in energy efficiency retrofits. Operational areas within Hydro have also  
22 implemented PCB Reduction Environmental Management System Programs to align with  
23 the Federal PCB Regulations and the elimination of PCBs in operation by 2025. As part of the  
24 program, surveys have been performed and will continue until 2025 to identify any  
25 remaining fixtures containing PCBs and target them for replacement with modern lighting  
26 technologies.