WHENEVER, WHEREVER. We'll be there.



October 10, 2024

Board of Commissioners of Public Utilities P.O. Box 21040 120 Torbay Road St. John's, NL A1A 5B2

Attention:

Jo-Anne Galarneau

Executive Director and Board Secretary

Dear Ms. Galarneau:

Re: Newfoundland and Labrador Hydro – 2025 Capital Budget Application

Please find enclosed Newfoundland Power's Requests for Information NP-NLH-021 to NP-NLH-025 in relation to the above-noted Application.

If you have any questions regarding the enclosed, please contact the undersigned.

Yours truly,

Dominic Foley

Legal Counsel

ec. Shirley Walsh

Newfoundland & Labrador Hydro

Paul L. Coxworthy Stewart McKelvey

Senwung F. Luk

Olthuis Kleer Townshend LLP

Nick Kennedy

Olthuis Kleer Townshend LLP

Dennis M. Browne, K.C.

Browne Fitzgerald Morgan & Avis

Denis J. Fleming

Cox & Palmer

Dean A. Porter

Poole Althouse

IN THE MATTER OF the Public Utilities Act, RSNL 1990, c P-47 ("Act"); and

IN THE MATTER OF an application by Newfoundland and Labrador Hydro ("Hydro") for approval of: (i) its capital budget for 2025, pursuant to Section 41(1) of the Act, (ii) its proposed capital purchases and construction projects for 2025 in excess of \$750,000, pursuant to Section 41(3)(a) of the Act, (iii) contributions by certain Customers for contributions towards the cost of improvements to certain property, pursuant to Section 41(5) of the Act, and (iv) for an Order, pursuant to Section 78 of the Act, fixing and determining its average rate base for 2023 ("Application").

Requests for Information by Newfoundland Power Inc.

NP-NLH-021 to NP-NLH-025

October 10, 2024

Requests for Information

NP-NLH-021 Reference: Response to Request for Information NP-NLH-002.

What other possible near term capital expenditures (e.g. within the next 5 years) is Hydro aware of that have not been included in its 5-year capital plan?

NP-NLH-022 Reference: Response to Request for Information NP-NLH-004.

Given the possibility of further delays in commissioning Unit 1 of the Holyrood Thermal Generating Station ("Holyrood"), has Hydro undertaken any contingency planning as a result of the possibility that one or more generating units at Holyrood may be unavailable during the peak winter season?

NP-NLH-023 Reference: Response to Request for Information NP-NLH-006.

Given that the Renew Distribution Feeders program is typically classified as a Renewal investment, please explain Hydro's rationale for placing the Upgrade Worst-Performing Distribution Feeders program within the Service Enhancement investment classification.

NP-NLH-024 Reference: PUB-NLH-026 and Hydro's 2023 Capital Budget
Application, Program 15 – Wood Pole Line Management.

In its 2023 Capital Budget Application, Hydro described its reliance upon a "gap year" between wood pole inspection and refurbishment activity to allow for outage planning, environmental requirements and procurement processes. In Hydro's experience, has the utilization of a gap year for wood pole management been effective in identifying environmental and other requirements and associated costs? Please explain.

NP-NLH-025 Reference: Response to Request for Information PUB-NLH-039.

Given the lead time of 12 to 18 months quoted by Hydro's vendors for the purchase of this transformer, has Hydro considered proposing this as a multiyear project? If not, why not?

 $\textbf{RESPECTFULLY SUBMITTED} \ \text{at St. John's, Newfoundland and Labrador, this } 10^{th} \ \text{day of }$

October, 2024.

NEWFOUNDLAND POWER INC.

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