

1 Q. **Reference: Application, Five-Year Capital Plan (2025-2029), page 11.**

2 It is stated *“Modifications to terminal stations to improve oil and fire containment and to*  
3 *accommodate the interconnection of mobile substations when required.”* Is oil and fire  
4 containment at terminal stations a legal requirement?

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7 A. Oil and fire containment are not legislatively mandated. Newfoundland and Labrador Hydro, in  
8 consultation with its property insurer, utilizes a risk-based approach which considers factors  
9 such as asset criticality and location to identify the need for fire and/or oil containment.  
10 Containment of this nature mitigates the reliability and environmental risk associated with the  
11 release of oil into the environment and/or equipment fire, in particular the risk of loss  
12 associated with fire spread within a terminal station.