



120 Torbay Road • Prince Charles Building, Suite E210 • St. John's, Newfoundland and Labrador • A1A 2G8

2025-07-22

Newfoundland and Labrador Hydro

Shirley Walsh

E-mail: shirleywalsh@nlh.nl.ca

Dear Ms. Walsh:

Re: Newfoundland and Labrador Hydro - 2025 Capital Budget Application as per Order No. P.U. 28(2024) - Notification of Change to Project Budget - Perform Level 2 Condition Assessment Stage 1 & 2 Cooling Water Sump Structure - To NLH - Additional Requests for Information

Enclosed are additional Requests for Information PUB-NLH-008 to PUB-NLH-010 regarding the above-noted matter.

On July 15, 2025 Hydro filed its reply submission. On the same date, Hydro filed its 2026 Capital Budget Application. The Board has additional questions based on the information provided in the reply, as well as information provided in a report referenced in the capital budget application.

The Board asks that Hydro provide replies to the additional requests for information by Tuesday, July 29, 2025.

If you have any questions, please do not hesitate to contact the Board's Legal Counsel, Ms. Jacquie Glynn, by email, jglynn@pub.nl.ca or by telephone 709-726-6781.

Sincerely,

Jo-Anne Galarneau

Executive Director and Board Secretary

JAG/cj

ecc **Newfoundland and Labrador Hydro**

NLH Regulatory, E-mail: NLHRegulatory@nlh.nl.ca

Newfoundland Power Inc.

Dominic Foley, E-mail: dfoley@newfoundlandpower.com

Douglas Wright, E-mail: dwright@newfoundlandpower.com

NP Regulatory, E-mail: regulatory@newfoundlandpower.com

Labrador Interconnected Group

Senwung Luk, E-mail: sluk@oktlaw.com

Nick Kennedy, E-mail: nkennedy@oktlaw.com

Consumer Advocate

Dennis Browne, KC, E-mail: dbrowne@bfma-law.com

Stephen Fitzgerald, KC, E-mail: sfitzgerald@bfma-law.com

Sarah Fitzgerald, E-mail: sarahfitzgerald@bfma-law.com

Bernice Bailey, E-mail: bbailey@bfma-law.com

Industrial Customer Group

Paul Coxworthy, E-mail: pcoxworthy@stewartmckelvey.com

Glen G. Seaborn, E-mail: gseaborn@poolealthouse.ca

Denis Fleming, E-mail: dfleming@coxandpalmer.com

1 **IN THE MATTER OF** the **Electrical Power**
2 **Control Act**, 1994, SNL 1994, Chapter E-5.1
3 (the “**EPCA**”) and the **Public Utilities Act**, RSNL
4 1990, Chapter P-47 (the “**Act**”), as amended,
5 and regulations thereunder; and
6

7 **IN THE MATTER OF** Order No. P.U. 28(2024) in
8 relation to Newfoundland and Labrador Hydro's
9 Capital Budget application; and
10

11 **IN THE MATTER OF** Newfoundland and Labrador
12 Hydro's notification of change to project budget for
13 the Level 2 Condition Assessment of the Stage 1 & 2
14 Cooling Water Sump Structures at the Holyrood
15 Thermal Generating Station, filed June 3, 2025.

**PUBLIC UTILITIES BOARD
REQUESTS FOR INFORMATION**

PUB-NLH-008 to PUB-NLH-010

Issued: July 22, 2025

PUB-NLH-008

Hydro stated the following in its July 15, 2025 reply submission:

“Alternatively, the [condition assessment] information can help Hydro determine if the temporary workarounds in place are sufficient to enable work to continue within Pumphouse 1 for the remainder of the Bridging Period, during which time generation from Holyrood TGS is required.”

(a) Does this statement also apply to Pumphouse 2? If not, please explain the different responses/approaches for the two pumphouses.

(b) What potential findings from the level 2 condition assessment might influence Hydro to leave the temporary workarounds in place until the end of the Bridging Period? In the response, please reconcile this with Hatch’s December 14, 2022 recommendation that “the beams and slabs be refurbished to their original condition or that new beams be installed directly beneath the existing beams to re-establish the original capacity”, which was repeated in the Holyrood Thermal Generating Station Capital Plan Refresh report completed by Hatch in March 2025 (“HTGS Capital Plan Refresh”) and referenced in Hydro’s 2026 Capital Budget Application.

PUB-NLH-009

Hydro stated the following in its July 15, 2025 reply submission:

“Proceeding directly to refurbishment based on preliminary assumptions would expose Hydro and ratepayers to significant cost and schedule risks.”

(a) Confirm if both the condition assessment and expected refurbishment will require de-watering the sumps. If so, explain the implications on both cost and schedule of completing this work twice.

(b) Would it be practical to combine the condition assessment and refurbishment into a single project with two phases rather than separate projects? In the response, explain the implications on both cost and schedule of such an approach.

PUB-NLH-010

In the HTGS Capital Plan Refresh, referenced in Hydro’s 2026 Capital Budget Application, Hatch stated:

“Considering the recommendations of the 2022 assessment, this report recommends a new project included in the LECA for the refurbish work of the pump house in the year 2025 with a cost of \$4M based on the estimate provided in the 2022 assessment report.”

- 1 (a) Was Hatch aware of Hydro's proposal to complete the condition
2 assessment in 2025 when the HTGS Capital Plan Refresh was filed?
3 (b) Does Hatch's updated recommendation impact Hydro's proposal
4 to complete the condition assessment in advance of the
5 refurbishment project or the information provided by Hydro in
6 response to NLH-PUB-006? Please explain.

DATED at St. John's, Newfoundland and Labrador this 22nd day of July 2025.

BOARD OF COMMISSIONERS OF PUBLIC UTILITIES

Per

A handwritten signature in blue ink, appearing to read 'Jo-Anne Galarneau', is written over the printed name.

Jo-Anne Galarneau
Executive Director and Board Secretary