Further to the response to PUB-NLH-031, what rate of replacement and approximate budget amount would be required to replace all disconnect switches 60 years of age or older by the end of 2028?

A.

Q.

Newfoundland and Labrador Hydro ("Hydro") has identified an error in its response to PUB-NLH-031; there are 39 disconnect switches that will have reached a service life of 60 years by the end of 2028. To replace all by then, Hydro would need to include 19 of these 39 in 2027, and 20 in 2028.¹ This would require the revision of the proposed program, and the submission of a supplemental capital budget application with the revised proposal. Assuming budget approval was received, purchase orders would need to be placed by March of each preceding year for delivery within 56 weeks. The ability to replace all 39 switches also necessitates increased labour, equipment, and outage availability. The increased replacements in 2027 and 2028 would likely delay higher-priority projects. The approximate budget amount to replace the 39 disconnect switches that will have reached a service life of 60 years by the end of 2028 is \$5,385,000.

Hydro has developed the Replacement Disconnects Program considering system criticality, ability to execute, and resource and outage constraints. This program's pace is determined by these considerations. At the current pace of replacement for disconnect switches, all 39 of these disconnect switches are anticipated to be replaced by year 2036; Hydro considers this to be prudent for these particular disconnect switches given that none of them have been determined to meet either of our other two disconnect switch replacement criteria stated in Hydro's "Terminal Station Asset Management Strategy – 2025 Update." Hydro plans to update its Terminal Station Asset Management Strategy to clarify its disconnect replacement strategy to state that disconnects at age 60 are eligible for replacement but not necessarily planned for replacement at age 60.

¹ The time frame is too short to be able to change the proposed program to replace more than are currently proposed for 2026.

² "2026 Capital Budget Application," Newfoundland and Labrador Hydro, July 15, 2025, vol. I, sch. 1. app. F.