

1 Q. **Reference: Application, Schedule 3, page 5; Schedule 2, Appendix A**

2 Hydro states that retirement of Holyrood “*cannot be fully enabled until both the Avalon*
3 *Combustion Turbine (‘CT’) and Bay d’Espoir (‘BDE’) Unit 8 are in service.*” Schedule 2, Appendix A
4 includes Unit 8 expenditure of \$154,574,500 in 2031.

5 a) Please provide the current P50 and P80 commercial-operation dates for the Avalon
6 Combustion Turbine and Bay d’Espoir Unit 8. For each, list every Board Order authorizing
7 early execution, the amount authorized, expenditures and commitments to date, and the
8 remaining amount not approved.

9 b) If either P80 date falls after the winter of 2029/30, please identify each 2027 Holyrood
10 steam-related expenditure in this Application whose remaining-life assumption would
11 then be incorrect, and the undepreciated cost of that expenditure as of March 31, 2030.

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14 A. Newfoundland and Labrador Hydro (“Hydro”) believes that this Request for Information is
15 outside the scope of the 2027 Capital Budget Application. The proposed Avalon Combustion
16 Turbine and Bay d’Espoir Unit 8 projects are the subject of a separate regulatory application and
17 proceeding. Matters relating to the status of those projects, including projected commercial-
18 operation dates, expenditure approvals, expenditures and commitments to date, and remaining
19 approval requirements, are more appropriately addressed within those proceedings.

20 Hydro further notes that part (b) of this Request seeks an assessment of the implications of
21 potential delays to those projects on future resource adequacy and the continued operation of
22 the Holyrood Thermal Generating Station. Such matters relate to system reliability, resource
23 adequacy, and long-term supply planning and are more appropriately considered in the
24 proceedings addressing those issues.