

1 **Q. (Reference Application Schedule A, page 2 of 6, and Schedule B, LED Street**
2 **Lighting Replacement, page 2) On Schedule A, there are 3 street lighting**
3 **projects and programs including: LED Street Lighting Replacement, New Street**
4 **Lighting and Replacement Street Lighting. Schedule B states with respect to**
5 **the LED Street Lighting Replacement Program (page 2) “Street light fixtures**
6 **will be replaced on an ongoing basis throughout the year in response to street**
7 **light trouble calls.” Why is the Replacement Street Lighting program not**
8 **incorporated under the LED Street Lighting Replacement project?**
9

10 A. The *LED Street Lighting Replacement* project involves the replacement of existing High
11 Pressure Sodium (“HPS”) street light fixtures with Light Emitting Diode (“LED”) fixtures.¹
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13 The *Replacement Street Lighting* program involves the replacement of failed street light
14 poles and hardware, including overhead and underground wiring and pole-mounting
15 brackets.
16

17 In 2021, the Company commenced implementation of a plan to provide all Street and
18 Area Lighting customers with LED fixtures. In the *2021 Capital Budget Application*,
19 Newfoundland Power filed the *LED Street Lighting Replacement Plan* (“the Plan”) to
20 replace all existing HPS street lights with LED street lights. The Plan is to be completed
21 over six years at a budget estimate of \$32.8 million. The budget estimate only included
22 cost for replacing street light luminaires, and did not include any cost associated with
23 street light poles and hardware, including overhead and underground wiring and pole-
24 mounting brackets.
25

26 The Company has separated the cost associated with street light poles, wiring
27 replacements and hardware into its own program. Doing so will ensure clarity when
28 comparing the annual expenditures for the replacement of HPS street lights with LED
29 street lights to the budget provided in the Plan.

¹ Newfoundland Power adopted LED street lighting as its service standard in 2019 following Board approval in Order No. P.U. 2 (2019).