

- 1 **Q. (Reference Application, 3.1 2024 Transmission Line Rebuild, page 3) It is**  
2 **stated "The substandard design of this line means it is not built to withstand**  
3 **local climatic conditions, which increases its probability of failure."**
- 4 **a) Is it a statutory requirement that line 146L be built to withstand local**  
5 **climate conditions?**
- 6 **b) For how long has the line not been able to withstand local climate**  
7 **conditions?**
- 8 **c) Please provide outage statistics for this line for each of the past 10 years.**
- 9 **d) Please provide maintenance costs for this line in each of the past 10 years.**
- 10 **e) Have any environmental or regulatory and/or field studies or likewise been**  
11 **undertaken in Newfoundland Power's planning process to mitigate**  
12 **unanticipated terrain/environmental issues such as those encountered**  
13 **with Transmission Line Rebuild 124L?**
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- 15 **A.** a) Newfoundland Power has a statutory obligation to provide its customers with service  
16 using facilities that are reasonably safe and adequate. The provincial power policy  
17 also requires the Company to provide power at the lowest possible cost, in an  
18 environmentally responsible manner, consistent with reliable service. The Company  
19 must also comply with various other provincial and federal regulations, as well as  
20 industry standards including environmental, health and safety regulations. It is not a  
21 statutory requirement of Newfoundland Power to ensure all existing facilities are  
22 constructed to meet current day standards.
- 23
- 24 b) Newfoundland Power designs its transmission lines to meet Canadian Standards  
25 Association ("CSA") standards and guidelines outlined in *CSA standard*  
26 *C22.3 - Overhead Systems*. This standard is updated on a regular basis, with each  
27 update introducing various changes and additional design requirements. Return  
28 period weather load guidance, which accounts for local climatic conditions was  
29 introduced in the 2020 update to *CSA Standard C22.3 - Overhead Systems*.  
30 Transmission Line 146L was not built to withstand the local climatic conditions as  
31 outlined in the 2020 update.

- 1 c) Table 1 provides outage statistics on Transmission Line 146L over the period from  
2 2012 to 2022.

Table 1 146L Outage Statistics (2012 to 2022)			
Date	Planned / Unplanned	Outage Cause	Duration (Hours)
September 2014	Planned	Preventative Maintenance	337.6
July 2017	Planned	Preventative Maintenance	10.1
November 2018	Unplanned	Severe Weather	3.5
December 2019	Planned	Preventative Maintenance	29.8
July 2022	Unplanned	Equipment Failure	44.2

- 3 d) See the response to Request for Information NLH-NP-020.  
4  
5 e) Newfoundland Power has not completed formal environmental, regulatory or field  
6 studies. The Company has completed an engineering assessment of field conditions  
7 which informed the budget estimate for the proposed project.<sup>1</sup>

<sup>1</sup> An example of work completed as part of the engineering assessment included the selection of the right-of-way.