

1 **Q. (Reference Application, 2.1 2025 Substation Refurbishment and**  
2 **Modernization, Appendix A: Summerville Substation Refurbishment and**  
3 **Modernization, page 8) It is stated "The power transformer and voltage**  
4 **regulators do not have a spill containment foundation." Have the NWB, SMV**  
5 **and LOK substations ever had spill containment foundations? Is spill**  
6 **containment required for regulatory compliance?**

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8 A. NWB and SMV substations have not had spill containment foundations. LOK substation  
9 contains both spill pans and a spill containment foundation.

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11 In carrying out its duties under the *Public Utilities Act* (the "Act") and the *Electrical*  
12 *Power Control Act, 1994*, (the "EPCA"), the Board is required by section 4 of the EPCA to  
13 apply tests which are consistent with generally accepted sound public utility practice.  
14 Newfoundland Power is required by section 37 of the Act to maintain services and  
15 facilities that are reasonably safe and adequate. The Company is also required by  
16 section 3(b)(iii) of the EPCA to ensure that all facilities for the distribution of power are  
17 managed and operated in a way that is lowest cost, environmentally responsible, and  
18 consistent with reliable service.

19  
20 The construction of substation spill containment foundations is recommended by  
21 engineering standards. IEEE Standard 980-2021 *Guide for Containment and Control of*  
22 *Oil Spills in Substations* recommends spill containment to prevent or mitigate the  
23 environmental impacts of an oil release or spill. These impacts can range from the clean-  
24 up costs incidental to a spill, to the contamination of water supplies. Additionally, IEEE  
25 Standard 979-2012 *Guide for Substation Fire Protection* recommends spill containment  
26 to minimize the surface area of a spill, which provides fire protection benefits.<sup>1</sup>

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28 Newfoundland Power has experienced failures of oil-filled electrical equipment that  
29 resulted in the release of mineral oil into the environment. Spill containments are  
30 installed as a due diligence measure to minimize the risk of mineral oil entering the  
31 environment. The power transformers and voltage regulators at substations contain  
32 large amounts of insulating oil. Proper spill containment is required to mitigate the risk  
33 of an environmental incident if an oil spill were to occur. Remediation costs associated  
34 with oil spills can be significant. In addition, spill containment will minimize the surface  
35 area of an oil spill and thus provides fire protection benefits.

36  
37 Spill containment is consistent with generally accepted sound public utility practice, is  
38 required to maintain facilities that are safe and adequate, and is consistent with the  
39 management of distribution facilities that is least cost, environmentally responsible and  
40 consistent with reliable service.

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42 For more information, see the response to Request for Information CA-NP-164.

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<sup>1</sup> See Newfoundland Power's *2025 Capital Budget Application*, Report 2.1 *Substation Refurbishment and Modernization*, page 17.