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- (Reference CA-NP-124) In regard to transmission line 108L: a) If a transmission line was not designed to meet current standards then
 - does that require immediate replacement? How often do design standards change?
 - b) According to 3.1 Gander-Twillingate Transmission System Planning Study (page 11, Table 4) during October -December 2021, there was planned outage on 108L of 1015.4 hours for preventative maintenance. (i) Please provide the details of that preventive maintenance and whether the 2019 unplanned outage was the impetus for it. (ii) Indicate how that maintenance may have helped increase the longevity of the line.
 - c) How many poles on 108L have been replaced each year since 2000?
- a) As discussed in the response to Request for Information CA-NP-124, Newfoundland Power currently adheres to the Canadian Standards Association ("CSA") standards and quidelines outlined in CSA Standard C22.3 – Overhead Systems when designing and maintaining its transmission system. CSA considers their standards to be living documents, which are regularly revised and refreshed to address changing requirements and emerging technologies. At a minimum, CSA Standards are reviewed and updated every five years.
 - CSA Standard C22.3 allows for a utility to continue operating existing installations that meet the requirements of prior editions without modification except for when mandated for safety reasons by an authority having such jurisdiction.
- b) The preventative maintenance which was completed on Transmission Line 108L during the October to December outage in 2021 involved replacing four poles, four cross arms and one anchor log. This work was unrelated to the unplanned outage which occurred in 2019. The work coincided with a planned rebuild of a section of Cobb's Pond ("COB") Substation distribution feeder COB-01. Due to the proximity of Transmission Line 108L and COB-01, the rebuild of COB-01 was aided by an extended outage to Transmission Line 108L as facilitated by a load transfer onto Transmission Line 142L.

While the maintenance completed during this outage was necessary to address the deteriorated condition of the four affected structures on Transmission Line 108L, the replacement of those components did not materially increase the longevity of the line as whole.

1 2 c) Table 1 shows the number of poles replaced on Transmission Line 108L each year from 2000 to 2023.

Table 1 Historical Pole Replacements on Transmission Line 108L (2000 to 2023)	
Date	Poles Replaced
2000	0
2001	0
2002	1
2003	0
2004	3
2005	0
2006	0
2007	2
2008	0
2009	31
2010	0
2011	1
2012	1
2013	13
2014	1
2015	1
2016	1
2017	0
2018	0
2019	1
2020	0
2021	4
2022	11
2023	0