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3.1 Gander-Twillingate Transmission System Planning Study

- a) Please provide in detail the environmental assessments conducted in Q. planning the project and the types of environmental costs reflected in the projected costs.
 - b) Please explain whether potential environmental costs were a relevant consideration in evaluating project alternatives and provide details.
 - a) Newfoundland Power does not conduct environmental assessments in advance of seeking project approvals. The Company conducts environmental assessments when required as outlined in the Environmental Assessment Regulations 2003 under the Environmental Protection Act (the "EPA"), and includes costs associated with any anticipated environmental assessments within project estimates.

With respect to the Gander-Twillingate Transmission System Planning Study, environmental costs, including those associated with conducting environmental assessments, were considered across each alternative and were included as part of the project estimate.

For example, rebuilding Transmission Line 108L, as per Alternatives 1 and 3, or constructing a new transmission line between Lewisporte ("LEW") and Boyd's Cove ("BOY") substations, as per Alternative 2, would each require environmental assessments to be completed and submitted to the Provincial Government pursuant to the EPA. In addition to costs associated with completing environmental assessments, transmission-related costs also include provisions for unforeseen environmental-related expenditures. As a result, transmission-related environmental costs are consistent across each project alternative, totaling approximately \$125,000.

In addition to budgeting for costs associated with environmental assessments, the Gander-Twillingate Transmission System Planning Study includes provisions for other necessary environmental costs, such as those pertaining to spill-containment systems for power transformer installations. All three alternatives assessed within the referenced study would require new transformer spill-containment systems costing approximately \$101,000, which were also included in the project costs for each alternative.

b) As described in the response to part a), environmental costs associated with each alternative were included within the economic analyses of the *Gander-Twillingate* Transmission System Planning Study. Due to the similarities in these costs across each alternative, environmental costs were essentially irrelevant to the evaluation of the project alternatives. In the case of Alternative 3, which included the construction and installation of a utility-scale battery system, further environmental-related costs that may be associated with the technology, such as the disposal of batteries, were not considered. Due to the large difference in cost between this Alternative and Alternatives 1 and 2, excluding these potential additional costs would not impact the results of the study.