

**Section 2: Customer Operations/Environmental Responsibility**

**Q. Volume 1, Section 2, pages 2-23 to 2-26. Please explain what action Newfoundland Power has taken since the Electrical Power Control Act and the Public Utilities Act were both amended in 2023 to require that power is delivered to consumers in the province in an environmentally responsible manner, in addition to at the lowest possible cost consistent with reliable service, to ensure it is complying with this requirement.**

A. On May 25, 2023, the Provincial House of Assembly passed Bill 34 which implemented a number of amendments to the *Electrical Power Control Act* (“EPCA”) and *Public Utilities Act*.<sup>1</sup> One such amendment added the words “environmentally responsible manner” to section 3(b)(iii) of the ECPA such that it now reads:

*“It is declared to be the policy of the province that all sources and facilities for the production, transmission, and distribution of power in the province should be managed and operated in a manner that would result in power being delivered to consumers in the province at the lowest cost, in an environmentally responsible manner, consistent with reliable service.”*

While the EPCA was amended in 2023 to require that power is delivered to consumers in an environmentally responsible manner, Newfoundland Power included sustainability and environmental stewardship in its practices in advance of the EPCA amendments, and has continued to do so following EPCA amendments. Actions Newfoundland Power takes to ensure power is delivered to customers in an environmentally responsible manner include:

**A. Environmental Management System**

Newfoundland Power maintains comprehensive policies and procedures which guide its approach to environmentally responsible operations. The Company currently maintains an Environmental Management System (“EMS”) that conforms to the internationally recognized ISO 14001 standard. The Company’s EMS is compliant with all environmental legislation and is verified by third party auditors every two years.<sup>2</sup> In addition, Newfoundland Power has been recognized as a Sustainable Electricity Leader™ by Electricity Canada which is based primarily on ISO 26000 guidance on social responsibility.<sup>3</sup>

**B. Environmental Assessments and Environmental Protection Plans**

The Company manages its construction and maintenance activities to avoid harm to the province’s environment and to support biodiversity. Newfoundland Power complies with

<sup>1</sup> See *An Act to Amend the Electrical Power Control Act, 1994 and the Public Utilities Act*, SNL 2023, c.10.

<sup>2</sup> ISO 14001 sets out the criteria for an environmental management system. It can provide assurance that environmental impact is being measured and improved.

<sup>3</sup> See Electricity Canada (n.d.). *Sustainable Electricity™ Program*. Retrieved February 20, 2023 from <https://www.electricity.ca/programs/sustainable-electricity-program/>

1 legislative requirements and the Company’s capital projects undergo Environmental  
2 Assessments as required. In addition, the Company develops Environmental Protection  
3 Plans to manage the environmental impact of its construction activities. Environmental  
4 Assessments and Environmental Protection Plans ensure the Company manages its  
5 capital projects in an environmentally responsible manner.  
6

### 7 ***C. Managing Spills and Waste***

8

9 Certain of Newfoundland Power’s assets contain substances that could be harmful if  
10 released into the environment. The Company’s asset maintenance standards and  
11 operational procedures are designed to prevent the release of these substances.  
12 Emergency preparedness tests are completed each year to confirm the effectiveness of  
13 prevention and response plans. In addition, employees are trained in best practices to  
14 perform immediate corrective action in the event of a release.  
15

16 Newfoundland Power follows the Institute of Electrical and Electronic Engineers  
17 (“IEEE”) Standard 980-2021 to construct spill containment for its oil-filled substation  
18 equipment to prevent ground contamination in event of an oil leak.<sup>4</sup> In addition, the  
19 Government of Canada requires that all oil-filled equipment with polychlorinated  
20 biphenyl (“PCB”) content greater than or equal to 50 parts per million be removed from  
21 operation by 2025.<sup>5</sup> Newfoundland Power is executing a multi-year plan and is on track  
22 to meet this requirement.<sup>6</sup>  
23

24 With respect to wood pole disposal, Newfoundland Power and its contractors follow  
25 guidance developed by Environment Canada’s Wood Preservation Strategic Options  
26 Process.<sup>7</sup> This group’s *Industrial Treated Wood Users Guidance Document* was designed  
27 to promote environmentally responsible management of the purchase, use, storage, and  
28 disposal of wood products treated with preservatives. Following the guidelines outlined  
29 in this document, along with the Provincial Government’s *Policy for Treated Utility*  
30 *Poles in Water Supply Areas*, ensures that Newfoundland Power’s procedures align with  
31 recommended industry best practices for the full lifecycle use of treated wood poles. In  
32 addition, Newfoundland Power has been recognized by Electricity Canada for the  
33 Company’s environmentally friendly solutions to extend pole life in protected public  
34 water supply areas.<sup>8</sup>

---

<sup>4</sup> IEEE Standard 980-2021 *Guide for Containment and Control of Oil Spills in Substations* recommends spill containment to prevent or mitigate the environmental impacts of an oil release or spill.

<sup>5</sup> See *Government of Canada PCB Regulation (SOR/2008-273)*.

<sup>6</sup> See Newfoundland Power’s *2024 Capital Budget Application, 2024-2028 Capital Plan*, page 16.

<sup>7</sup> See Environment Canada (2004, September 4) *Industrial Treated Wood Users Guidance Document*. Retrieved on February 20, 2024 from: [https://publications.gc.ca/collections/collection\\_2013/ec/En4-42-2004-eng.pdf](https://publications.gc.ca/collections/collection_2013/ec/En4-42-2004-eng.pdf)

<sup>8</sup> See Electricity Canada (n.d.). *Poles And Protected Public Water Supply Areas*. Retrieved February 20, 2023 from <https://www.electricity.ca/programs/centre-of-excellence/poles-and-protected-public-water-supply-areas/>

1           ***D. Generation and Emissions***

2  
3           More than 99% of the electricity generated by Newfoundland Power is hydroelectric.<sup>9</sup> As  
4           a result, the Company's direct emissions are lower than utilities with larger thermal  
5           generating portfolios. See the response to Request for Information PUB-NP-044 for  
6           further information on Newfoundland Power's emissions, including planned actions by  
7           Newfoundland Power to reduce emissions.

8  
9           For more information on the Company's commitment to delivering electrical service in  
10          an environmentally responsible manner, see Newfoundland Power's *Corporate Policy*  
11          *Statement* on its environmental commitment,<sup>10</sup> and Newfoundland Power's 2022  
12          *Sustainability Report*.<sup>11</sup>

---

<sup>9</sup> See the *2025/2026 General Rate Application, Volume 1, Application, Company Evidence and Exhibits, Section 2: Customer Operations*, pages 2-26.

<sup>10</sup> See Newfoundland Power Inc (2020, August 1). *Corporate Policy Statement*. Retrieved February 20, 2023  
<https://www.newfoundlandpower.com/-/media/PDFs/About-Us/Environment/Environmental-Policy.pdf>

<sup>11</sup> See Newfoundland Power Inc. (n.d.). *2022 Sustainability Report*. Retrieved February 20, 2023  
<https://www.newfoundlandpower.com/en/About/Sustainability/Sustainability-Report>