

1 **IN THE MATTER OF** the **Public**
2 **Utilities Act** (the “**Act**”); and
3
4 **IN THE MATTER OF** an application by
5 Newfoundland Power Inc. for an
6 Order pursuant to sections 41 and 78
7 of the **Act**: approving its 2027 Capital
8 Budget; and fixing and determining
9 its 2025 rate base.

**PUBLIC UTILITIES BOARD
REQUESTS FOR INFORMATION**

PUB-NP-001 to PUB-NP-014

Issued: July 6, 2026

General

Reference: Newfoundland Power's 2027 Capital Budget Application, 2027-2031 Capital Plan

Newfoundland Power is also forecasting to proactively replace an average of three power transformers annually to address the Company's aging power transformer fleet. Power transformer replacements are forecast to account for an average of \$7.3 million annually from 2027 to 2031.

PUB-NP-001 a) How does Newfoundland Power treat the remaining depreciable life and any undepreciated value of the assets being removed from service, including whether these remaining costs are reflected in the least-cost assessment of replacement versus continued operation?

b) Explain how proactive early removal affects depreciation expense and overall customer cost.

c) If all power transformers are retired based on their average depreciable life, how would this affect the average age and asset service life of the transformer fleet? Could this method reduce the assumed asset life used to calculate depreciation expense?

PUB-NP-002 a) Does Newfoundland Power have a strategy, which includes proactive power transformer replacements, increasing spare-transformer inventory, and the additional proposed portable substation, to determine the least-cost option for managing power transformer reliability risk?

b) Explain how each of the aforementioned approaches affects the need for the others.

c) If Newfoundland Power did not evaluate all three approaches together, please provide the reason.

Reference: Newfoundland Power's 2027 Capital Budget Application, Capital Budget Overview

PUB-NP-003 Provide a comparison of the distribution of renewal expenditures included in the 2026 CBA and the 2027 CBA in tabular form, identifying each project/program and the total. Please explain material changes in distribution renewal expenditures.

Reference: Newfoundland Power's 2027 Capital Budget Application, Schedule B 2027 Capital Projects and Programs - Over \$750,000

PUB-NP-004 a) Explain why Distribution Feeder Refurbishment projects are required in addition to existing programs that have historically relied on inspections, corrective maintenance, preventative rebuild work, and poor-performance reliability initiatives to address distribution capital maintenance needs.

b) Confirm whether the current seven-year inspection cycle for distribution feeders remains appropriate.

- c) For each proposed feeder refurbishment, provide the date of the most recent inspection, deficiencies identified at the time, work completed under other programs in the last seven years, and reliability performance data.

Substations

Reference: Newfoundland Power's 2027 Capital Budget Application, 2.1 Substation Strategic Plan

- PUB-NP-005**
- a) Provide the substations that have received more than one Refurbishment and Modernization project since the 2007 Substation Strategic Plan. Include the project years and the reasons for multiple refurbishments.
 - b) Prior to the work proposed for 2027, provide the date of the most recent refurbishment work for both Rattling Brook and Blaketown Substations.
 - c) Explain how Newfoundland Power determines what work should be completed in a single comprehensive refurbishment project versus being deferred to later capital projects.

Reference: Newfoundland Power's 2027 Capital Budget Application, 2027 Substation Refurbishment and Modernization, Appendix B - Rattling Brook Substation Refurbishment and Modernization

- PUB-NP-006**
- Newfoundland Power states that the project scope includes removing the obsolete 12.5 kV Nulec recloser and installing a modern replacement recloser.
- a) Has the Nulec recloser reached full operational obsolescence, including lack of manufacturer support and unavailable spare parts, or does Newfoundland Power consider the Nulec recloser obsolete because of its incompatibility with modern controls and protection systems?
 - b) Provide the installation year and current age of the existing Nulec recloser and how the age of the Nulec recloser compares with the average service life of reclosers for depreciation purposes.
 - c) State whether continued operation, repair, control replacement, spare-unit support, or targeted component replacement were considered as alternatives to full replacement.
 - d) Indicate if the recloser is being retired before its average service life and, if so, explain why early retirement is the preferred option.

Reference: Newfoundland Power's 2027 Capital Budget Application, 2027 Substation Refurbishment and Modernization Appendix C - Mobile Plant Substation Refurbishment and Modernization

- PUB-NP-007**
- a) Explain why the Mobile Plant Substation Refurbishment and Modernization work was not presented together with the 2026 CBA MOP-T1 replacement project.
 - b) Explain why transformer replacements and associated Substation Refurbishments are not treated as a cluster of related projects for the

purpose of providing a consolidated scope, cost, justification, alternatives analysis, and customer-impact assessment.

Power Transformers

PUB-NP-008 The 2026 CBA Power Transformer Strategy identified 107 power transformers for replacement over a 30-year period ending in 2052.

- a) Explain how Newfoundland Power expects the overall risk and impact of transformer failures to change as the strategy is implemented. Is total fleet risk expected to decline as replacements are completed? If not, explain why.
- b) Provide a fleet-level forecast showing, by year:
 - (i) number of transformers replaced;
 - (ii) remaining fleet age profile relative to the average depreciable life; and
 - (iii) condition/risk score distribution.
- c) Provide the average age for all power transformer retirements for each year over the period 2017 to 2027F.
- d) Explain how Newfoundland Power will avoid overbuilding portable-substation capacity if proactive transformer replacements reduce future transformer-failure risk.

Reference: Newfoundland Power's 2027 Capital Budget Application, 2.2 Substation Power Transformer Strategy, page 7, Footnote 20

- PUB-NP-009**
- a) In addition to the diagnostic maintenance inspections identified for Newfoundland Power's power transformer fleet, provide an outline of any additional physical inspection activities carried out. Detail how the results are used to assess the transformer's condition, remaining life, and replacement timing.
 - b) Provide the maintenance history for each transformer from 2016 to 2026 and explain how that history supports replacement rather than further maintenance or repair.
 - c) Identify all maintenance or repair actions considered before concluding that replacement is required.

Reference: Newfoundland Power's 2027 Capital Budget Application, 2.2 Substation Power Transformer Strategy

PUB-NP-010 Provide the historical annual in-service power transformer failure rate for each transformer proposed for replacement, for the period 2015 to 2025, and compare it with the forecast failure rates used to support the Power Transformer Strategy and Portable Substation projects.

- PUB-NP-011** a) Does Newfoundland Power have an existing preventative Power Transformer Maintenance Program? Please provide a copy.
- b) What strategy does Newfoundland Power apply for life extensions for power transformers?

- PUB-NP-012** Newfoundland Power is proposing the replacement of four transformers.
- a) Have these four transformers been selected based on age only?
- b) For LAU-T1, LBK-T1 and RRD-T3, Newfoundland Power states that the Normal Degradation Index values are below the 0.6 threshold. Does this indicate that these transformers have useful service life remaining?
- c) Identify the threshold of Normal Degradation Index values that Newfoundland Power uses to determine when a transformer should be monitored, repaired, refurbished, or replaced. Explain why LBK-T1 is proposed for replacement, given that the degradation results indicate 0.29, which remains far below the 0.6 threshold.

Reference: Newfoundland Power's 2027 Capital Budget Application, 2.2 Substation Power Transformer Strategy, page 8

- PUB-NP-013** Provide a summary of the existing assets and their utilization, including installed capacity and availability at the Lookout Brook Hydro Plant.

Generation - Hydro

Reference: Newfoundland Power's 2027 Capital Budget Application, 3.1 Rose Blanche Hydro Plant Refurbishment

- PUB-NP-014** a) Explain how Newfoundland Power determined that the Rose Blanche Hydro Plant assets proposed for replacement have reached the end of their service life, having regard to the plant's age and the depreciable life of the assets.
- b) What system risks and operational issues are the assets proposed for replacement causing?
- c) Give details on the changes in existing infrastructure conditions responsible for advancing the project to 2027, as it was originally planned for 2029 in the 2026 CBA.
- d) Provide reasons for the increase in cost from \$859,000 as proposed in the 2026 CBA to \$1,728,000.
- e) Provide any asset-condition assessment reports of Newfoundland Power's hydroelectric plants completed during the last five years.
- f) Explain how potential hydroelectric plant enhancement has been considered in the context of Newfoundland and Labrador Hydro's generation expansion plans.

DATED at St. John's, Newfoundland and Labrador this 6th day of July 2026.

BOARD OF COMMISSIONERS OF PUBLIC UTILITIES

Per



Mike McNiven
Board Secretary