

1 Q. **Reference: Application, Page 3, Lines 7 - 10 and Application, Attachment 1, Page 24, Lines 8 -**
2 **10**

3 On Page 3 of the Application at Lines 7 - 10, Hydro states:

4 Prior to 2019, the Charlottetown Diesel Generating Station had three diesel
5 gensets inside the powerhouse with an installed capacity of 1,770 kW and two
6 mobile units located outside with an installed capacity of 1,635 kW. The total
7 installed capacity was 3,405 kW with a total firm capacity of 2,495 kW.

8 and

9 On Page 24 of Attachment A to the Application at Lines 8 - 10, Hydro states:

10 The engine hall would have adequate space to accommodate five 1,000 kW
11 diesel units including provisions for future load growth. There would be four
12 units initially installed to provide enough generation capacity to meet current
13 forecasted peak demand.

14 Please explain why a smaller sized facility with mobile generation for summer peaking, similar to
15 what existed prior to the 2019 fire, would not be acceptable for the new Charlottetown diesel
16 generating station.

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19 A. As noted in Newfoundland and Labrador Hydro's ("Hydro") response to PUB-NLH-001, the direct
20 rebuild of the Charlottetown Diesel Generating Station to the same specifications that existed
21 prior to the 2019 fire is not acceptable for long-term supply for Charlottetown.

22 It is Hydro's view that it would be imprudent to rebuild the exact facility that previously existed
23 without consideration for the current and future needs of the facility and community. Hydro's
24 response to PUB-NLH-001 and Section 3.2 of Attachment 1 of the application¹ outline numerous
25 safety and reliability risks, as well as environmental and operating considerations, associated

¹ "Long-Term Supply for Southern Labrador – Phase 1," Newfoundland and Labrador Hydro, July 16, 2021, sch. 1, att. 1, sec. 3.2, pp. 14–17.

1 with the use of mobile generation as a permanent source of supply. With the exception of risks
2 associated with winter operation, all other concerns would apply.

3 Additionally, the previous generating station, placed in service in 1989, did not have a fire
4 suppression system. Hydro is currently in the process of adding fire suppression to its diesel
5 facilities and would not construct a new diesel facility without a fire suppression system.

6 Even if the concerns above were ignored, a solution involving a direct replacement of the
7 previous plant is demonstrated to result in increased supply costs for the region, as per Hydro's
8 response to NP-NLH-041.

9 Alternative 2² outlines the requirements Hydro believes would be necessary for a replacement
10 facility for the Charlottetown Diesel Generating Station. Hydro's analysis determined that this
11 alternative also did not provide the least-cost solution for the long-term supply of southern
12 Labrador.

² "Long-Term Supply for Southern Labrador – Phase 1," Newfoundland and Labrador Hydro, July 16, 2021, sch. 1, att. 1, sec. 4.2, pp. 23–25.