

NLH - Application for the Purchase and Installation of Bay d’Espoir Unit 8 and Avalon
Combustion Turbine (Avalon Combustion Turbine)

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- 1 Q. (Reference Bates White Expert Addendum Report of Vincent Musco and Collin Cain,
2 June 5, 2026) It is observed (page 40) that Newfoundland Power plans to file a
3 supplemental capital application to refurbish its Greenhill and Wesleyville GTs, *“with*
4 *refurbishment work to be complete by 2031. The refurbishment project is estimated to*
5 *account for a total of approximately \$231 million, though NP notes this estimate is*
6 *subject to change in the forthcoming application.”*
- 7 a) The \$231 million cost estimate equates to \$4812/kW, and compares to \$6667/kW
8 for Hydro's Avalon CT. Hydro has suggested that CT prices could increase by almost
9 200% by 2027 (2025 Build Application - Avalon Combustion Turbine Evidentiary
10 Update, page 13). Does Bates White have an opinion on the reasonableness of the
11 Newfoundland Power estimate?
- 12 b) Has Bates White assessed the merits of this alternative relative to other
13 alternatives such as Bay d’Espoir Unit 8 and battery storage?
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- 15 A. (a) Bates White has not conducted a review of Newfoundland Power’s cost estimate or
16 the assumptions that underpin it.
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- 18 (b) We addressed the capacity contributions of Newfoundland Power’s gas turbines in
19 our November 6, 2025 Phase One Addendum Report at paragraphs 73 to 84.