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September 5, 2025

Board of Commissioners
of Public Utilities
P.O. Box 21040
120 Torbay Road
St. John's, NL A1A 5B2

Attention: Jo-Anne Galarneau
Executive Director and Board Secretary


Dear Ms. Galarneau:

Re: Newfoundland and Labrador Hydro – 2026 Capital Budget Application

Please find enclosed Newfoundland Power's Requests for Information NP-NLH-001 to NP-NLH-012 in relation to the above-noted Application.

If you have any questions regarding the enclosed, please contact the undersigned.

Yours truly,


Dominic Foley
Legal Counsel

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Newfoundland & Labrador Hydro

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IN THE MATTER OF the *Electrical Power Control Act, 1994*, SNL 1994, Chapter E-5.1 (“*EPCA*”) and the *Public Utilities Act*, RSNL 1990, Chapter P-47 (“*Act*”), and regulations thereunder; and

IN THE MATTER OF an application by Newfoundland and Labrador Hydro (“Hydro”) for approval of: (i) its capital budget for 2026, pursuant to Section 41(1) of the Act, (ii) its proposed capital purchases and construction projects for 2025 in excess of \$750,000, pursuant to Section 41(3)(a) of the Act, (iii) contributions by certain Customers for contributions towards the cost of improvements to certain property, pursuant to Section 41(5) of the Act, and (iv) for an Order, pursuant to Section 78 of the Act, fixing and determining its average rate base for 2024.

**Requests for Information by
Newfoundland Power Inc.**

NP-NLH-001 to NP-NLH-012

September 5, 2025

Requests for Information

- NP-NLH-001** **Reference: 2026 Capital Budget Application, Schedule 1, 2026 Capital Budget Overview, page 10.**
- Please provide an updated chart that shows what Hydro would have considered a “major project” in the years 2015 to 2024.
- NP-NLH-002** **Reference: 2026 Capital Budget Application, Schedule 2, Five-Year Capital Plan (2026-2030).**
- Does Hydro anticipate any capital projects related to the Holyrood Thermal Generating Station or Bay d’Espoir that are in the 5-year plan to impact the availability of generating units during the winter months?
- NP-NLH-003** **Reference: 2026 Capital Budget Application, Program 1, Wood Pole Line Management, page 8, chart 1 and page 9, chart 3.**
- Please explain how transmission assets are categorized as being in Category 1, 2 and 3. For charts 1 and 3 in particular, please explain what is represented by the green portion of the chart which is labelled “Proposed for [insert action].”
- NP-NLH-004** **Reference: 2026 Capital Budget Application, Program 1, Wood Pole Line Management, page 8, chart 2 and page 9, chart 3.**
- Please clarify why the total number of assets in chart 2 is different from chart 3.
- NP-NLH-005** **Reference: 2026 Capital Budget Application, Program 4, Replace Heavy-Duty Vehicles, page 4.**
- Chart 1 indicates that one or more vehicles proposed for replacement in 2026 are in the 0-5 year age category. Please provide the age, odometer reading, and condition of the vehicle(s) Hydro plans to replace.

NP-NLH-006

Reference: 2026 Capital Budget Application, Program 9, Perform Facilities Refurbishments, page 2, lines 1 to 4.

Hydro states *“To establish a prudent threshold for its refurbishment expenditures, Hydro applied a depreciation value of 2% against its current building systems inflation-adjusted original cost of \$274.0 million. This approach suggests an estimated annual renewal expenditure of approximately \$5.5 million is required in 2026 to adequately maintain Hydro’s building assets.”*

- a) Why has Hydro selected this estimating methodology based on inflation adjusted book value and a depreciation calculation? In the response, please explain how depreciation, an accounting method to allocate cost of a tangible asset over its useful life, implies the investments necessary to adequately maintain an asset?
- b) Has Hydro conducted a jurisdictional review of capital programs or other regulatory mechanisms used by other utilities to address deteriorated properties? If so, please provide the results. If not, why not?
- c) Provide the calculation completed to calculate the “inflation adjusted original cost” referenced on page 2.
- d) Please provide a table showing Hydro’s total capital spending on facilities refurbishments in each of the last 10 years.

NP-NLH-007

Reference: 2026 Capital Budget Application, Program 13, Overhaul Diesel Units.

Please provide a breakdown of the program budget estimate by unit proposed.

NP-NLH-008

Reference: 2026 Capital Budget Application, Project 1, Perform Boiler Condition Assessment and Miscellaneous Upgrades.

- a) Hydro indicates that this project has been completed on an annual basis since 2017. Please provide the annual cost of the project in each year since 2017.
- b) Has Hydro made any changes to its project budget estimate considering the change in project budget for the Level 2 Condition Assessment of the Stage 1 & 2 Cooling Water Sump Structures at the Holyrood Thermal Generating Station? If yes, please explain. If not, why not?

NP-NLH-009

Reference: 2026 Capital Budget Application, Project 6, Relocate Section of Line – TL220.

- a) For figure 3 on page 3, provide a map detailing the original route of TL220 and the proposed relocated route.
- b) Please confirm that Hydro is planning to rebuild a complete section of transmission line TL220 whereby 23 of the 109 poles are currently deteriorated and would require imminent replacement and 17 additional poles are expected to require replacement within the Wood Pole Line Management program by 2030.
- c) Please explain how replacement of the remaining 69 poles ($109 - 23 - 17 = 69$) is consistent with Hydro's Wood Pole Line Management initiative.
- d) If Hydro was not considering relocation of the section of transmission line TL220, would it plan to replace only the 23 poles that are currently deteriorated and require imminent replacement?
- e) Please provide a history of wood pole retreatment that has been applied to the line TL220. In Hydro's view, has the pole retreatment been effective in extending the life of transmission line TL220?

NP-NLH-010

Reference: 2026 Capital Budget Application, Project 8, Widen Right of Way – Gros Morne National Park, page 1, lines 11-12 and page 2, line 1.

“...ROWS of lines that run through the Park are currently narrower than those of all other Newfoundland and Labrador Hydro TLs by approximately 40-50%.”

Please provide a table outlining:

- i. The current width of each identified Transmission Line Right of Way (“ROW”) that is planned to be widened during the project,
- ii. The planned width of these ROWs after the project is completed, and
- iii. The standard ROW width for transmission lines on Hydro's transmission system outside of the Gros Morne National Park with equivalent voltages.

NP-NLH-011

Reference: 2025 Capital Budget Application, Project 13, Replace Roof – Hopedale.

- a) Did Hydro evaluate the cost of replacing the original roof which is 34 years old while maintaining the building extension roof which has been in service for 12 years?
- b) Please explain why the building extension roof is in need of replacement after 12 years of service.

NP-NLH-012

Reference: 2026 Capital Budget Application, Project 14, Perform Software Upgrades and Minor Enhancements – Information Technology, page 3.

For ad hoc requests, explain the criteria used to determine if an enhancement request is approved to proceed. Provide examples of past ad hoc requests and the rationale behind their selection.

RESPECTFULLY SUBMITTED at St. John's, Newfoundland and Labrador, this 5th day of September, 2025.



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