

1 Q. **Reference: CA-NLH-097.**

2 Regarding the proposed ROW widening for TL226, TL227 and TL 229, it is stated "*No injuries or*
3 *forest fires have occurred to date; however, trees that have caused outages due to contacting*
4 *the lines have been observed to be scorched, and may have caused wildfires under different fire*
5 *hazard index conditions.*"

6 **a)** Please clarify "to date". For how many years have there been no injuries or forest fires?

7 **b)** How would Hydro describe the 2025 forest fire season in Newfoundland and were there any
8 forest fires caused by falling trees along any of TL226, TL227 and TL229 in 2025?

9 **c)** In Widen Right of Way (2026-2028)-Gros Morne National Park, page 4, it is stated "Deferring
10 the widening of the ROWs would result in unacceptable risk to public safety due to
11 continued contact between trees and the transmission lines of concern." Please provide
12 evidence of there being an unacceptable risk to public safety, given the historical
13 experience.

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16 A. **a)** The reference to "to date" means up to the date of the reply to the Request for Information.
17 For further clarification, no injuries or forest fires have occurred as a result of the narrow
18 right-of-way on these transmission lines. TL226 and TL227 were constructed 55 years ago in
19 1970. TL229 was constructed 49 years ago in 1976.

20 **b)** There were no forest fires caused by falling trees along TL226, TL227 and TL229 in 2025. For
21 information regarding the 2025 forest fire season across the province, please refer to the
22 website published by the Government of Newfoundland and Labrador, Department of
23 Fisheries, Forestry and Agriculture.¹

24 **c)** The unacceptable risk to public safety is mainly due to the increased risk of wildfires caused
25 by tree contacts. There is a growing risk of wildfires amid climate change. Natural Resources

¹ Government of Newfoundland and Labrador, Forestry, Agriculture and Lands, [Forest Fire Season - Forestry, Agriculture and Lands](#).

1 Canada states *"Fire-prone conditions are predicted to increase across Canada. This could*
2 *potentially result in a doubling of the amount of area burned by the end of this century,*
3 *compared with amounts burned in recent decades. Boreal forests, which have been greatly*
4 *influenced by fire through history, will likely be especially affected by this change.*

5 *Other climate change impacts that could add damaged or dead wood to the forest fuel load (for*
6 *example, as a result of insect outbreaks, ice storms or high winds) may increase the risk of fire*
7 *activity."*²

8 Almost half of Gros Morne National Park is covered by boreal forest, and Parks Canada states
9 that *"an outbreak of spruce budworm is occurring along the west coast of Newfoundland,*
10 *including within Gros Morne National Park. High numbers of spruce budworm were detected in*
11 *some coastal areas of Gros Morne National Park in 2020. Defoliation became more widespread*
12 *and noticeable in 2021, and by 2024 the outbreak was affecting lowland forests throughout*
13 *much of the park."*³

14 While there have not been any fires caused by the narrow rights-of-way on these transmission
15 lines as of yet, Newfoundland and Labrador Hydro noted in its response to CA-NLH-097 –
16 referenced in the Consumer Advocate's question above – that *"trees that have caused outages*
17 *due to contacting the lines have been observed to be scorched, and may have caused wildfires*
18 *under different fire hazard index conditions."* There were 16 tree contacts on the lines of
19 concern between 2015 and 2021.⁴ Each of these tree contacts, under different fire hazard
20 conditions, could have resulted in ignition. If the existing rights-of-way are not widened, then
21 the risk of additional tree contacts increases. As a result of climate change, the risk of wildfires
22 resulting from contact is also increasing. This project is proposed to mitigate this risk.

² Government of Canada, "Climate change and fire, January 12, 2025. <https://natural-resources.canada.ca/forest-forestry/insects-disturbances/climate-change-fire>.

³ Government of Canada, "Spruce Budworm, Gros Morne National Park," October 18, 2024. <https://parks.canada.ca/pn-np/nl/grosmorne/nature/sb>.

⁴ "2026 Capital Budget Application," Newfoundland and Labrador Hydro, July 15, 2025, vol. II, sch 7. proj. 8, p. 4.