

1 Q. **Reference: Request for Information CA-NLH-158.**

- 2 a) Please provide the 2025 and 2026 YTD energy-in-storage values (table or graph) as
3 compared to the calculated minimum monthly resource storage limits. If the values for
4 September to November 2025 were not at the minimum monthly storage limit, please
5 provide a detailed explanation for the use of Holyrood for reservoir support as discussed
6 in CA-NLH-158.
- 7 b) Please clarify the comments about 17% of 11%, and indicate how much energy was
8 “injected” from Holyrood over and above the minimum capacity-driven operation.
- 9 c) Please indicate the maximum LIL/UFLS constraint that was in place for the 2025
10 minimum monthly storage limits (i.e., did the development of this curve precede the full
11 900 MW rate capacity increase).
- 12 d) Please provide the revised minimum monthly resource storage limits that would have
13 applied in 2025 if the revised 900 MW LIL rated capacity had been in place at that time.
- 14 e) Please confirm that all energy dispatch forecasts for the 2027 GRA test year are based
15 on the full 900 MW rates LIL capacity.

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18 A. a) Figure 1 and Figure 2 depict the 2025 and 2026 year-to-date energy-in-storage levels,
19 minimum storage limits, maximum operating level storage, and the 20-year average
20 aggregate storage for comparison in graphical form for 2025 and 2026, respectively.

21 As depicted in Figure 1, total system energy in storage approached and then declined below
22 the minimum storage limit in September 2025 and increased in November 2025 as a result
23 of a series of high inflow events. A full explanation of how Holyrood Thermal Generating
24 Station (“Holyrood TGS”) was utilized during this period is provided in Newfoundland and
25 Labrador Hydro’s (“Hydro”) response to CA-NLH-158 of this proceeding.

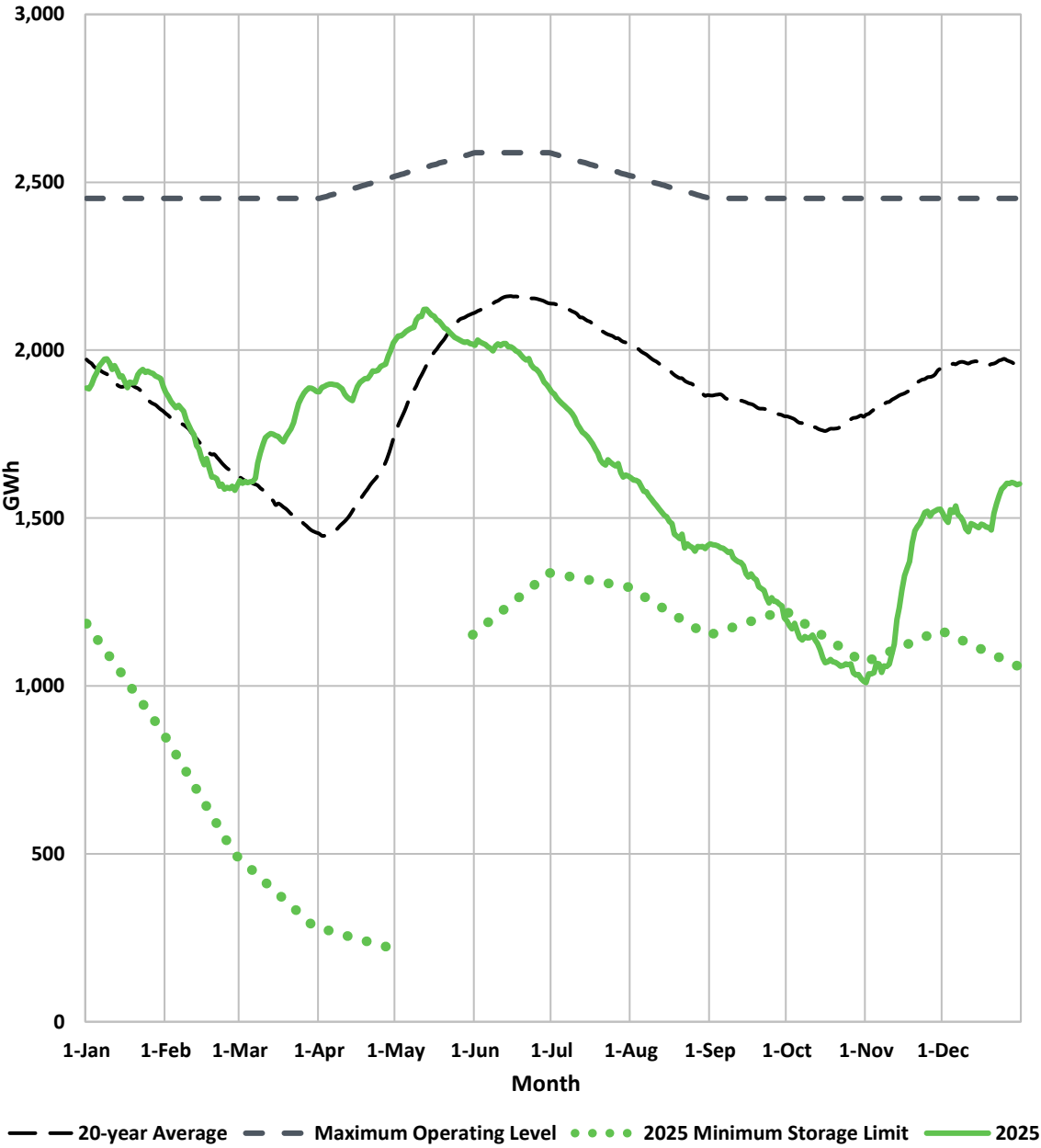


Figure 1: 2025 Total System Energy Storage

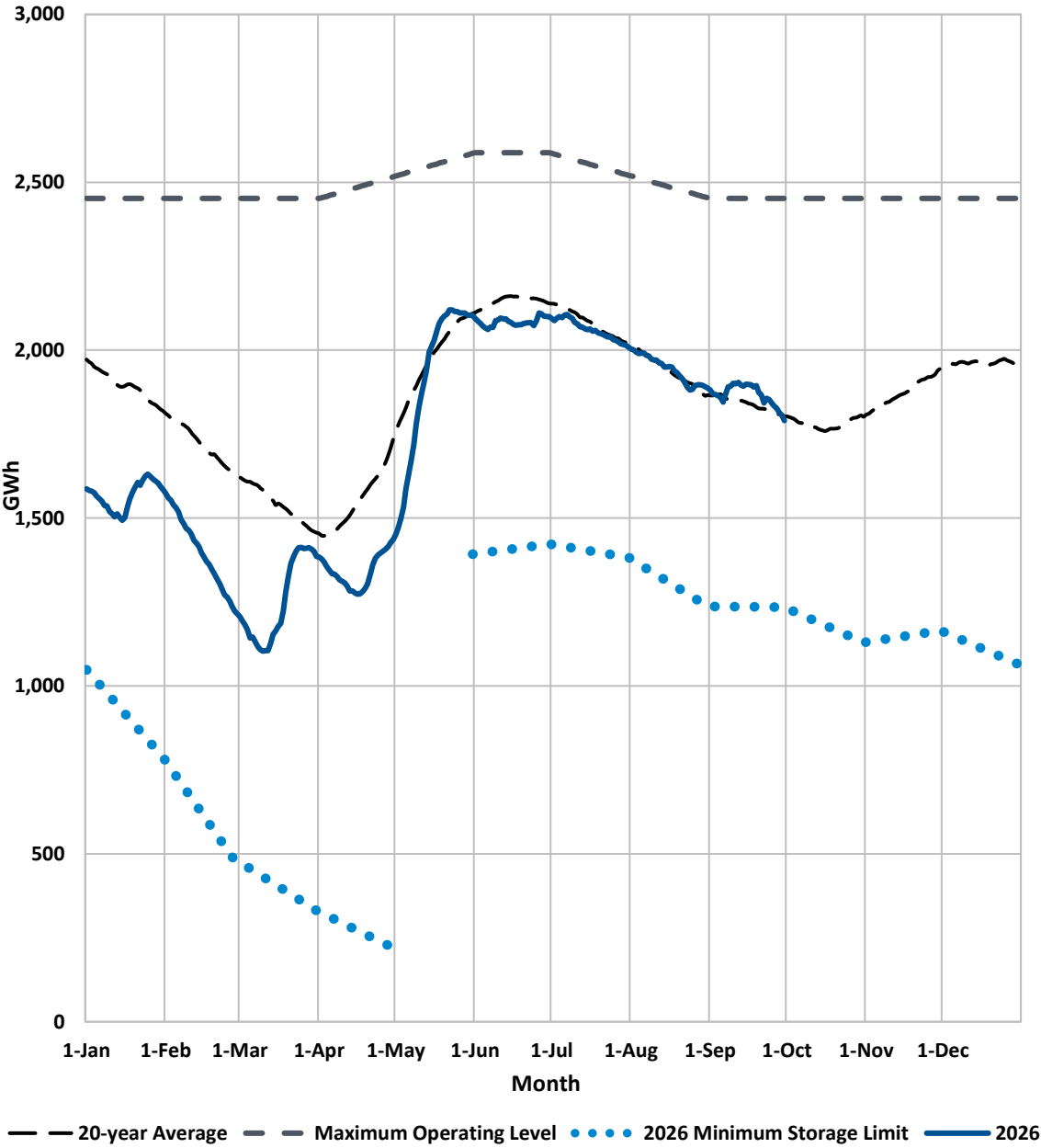


Figure 2: 2026 Year-to-Date Total System Energy Storage

1 **b)** In the 2027 Capital Budget Application,¹ Hydro stated, *"In 2025, Holyrood TGS was*
2 *responsible for approximately 11% of the Island's energy needs."* Total production from
3 Holyrood TGS in 2025 was 776.7 GWh and total generation to supply the Island
4 Interconnected System in 2025 was 7,153.5 GWh. This resulted in Holyrood TGS supplying
5 approximately 11%² of the energy requirements of the Island Interconnected System in
6 2025.

7 In response to CA-NLH-158 of this proceeding, Hydro described drought conditions from
8 mid-summer to late fall 2025 that required thermal injection, resulting in 17% of Holyrood
9 TGS total production supplying Island requirements for reservoir support during the
10 drought. This is clarified below.

11 From September to November 2025, Holyrood TGS production for minimum capacity-driven
12 purposes was planned to be 0 GWh, 25.2 GWh, and 75.6 GWh, respectively, for a total of
13 100.8 GWh. However, due to the drought that was experienced from mid-summer to late
14 fall, which led to aggregate storage approaching minimum storage limits, energy from
15 Holyrood TGS was used to support reservoir storage. This resulted in actual production from
16 September to November 2025 being 22.1 GWh, 92.4 GWh, and 116.8 GWh, respectively, for
17 a total of 231.3 GWh. Therefore, the amount of Holyrood TGS production due to reservoir
18 storage support was 130.5 GWh.³ In terms of a percentage, the amount of thermal injection
19 attributable to the drought period is approximately 17%.⁴

20 **c)** The minimum storage limits for 2025 were updated on September 30, 2025, utilizing the
21 Labrador-Island Link ("LIL") transmission limits associated with the final under-frequency
22 load shedding scheme.

23 LIL maximum power transfer capability of 700 MW in bipole mode was also assumed in the
24 development of the 2025 minimum storage limits. The 900 MW capacity increase did not
25 occur until the high-power testing was completed in March 2026. Therefore, the

¹ "2027 Capital Budget Application," Newfoundland and Labrador Hydro, rev. October 5, 2026 (originally filed July 14, 2026), vol. I, sch. 3, p. 3.

² $(776.7 \text{ GWh} / 7153.5 \text{ GWh}) * 100 = 10.9778\%$.

³ $231.3 \text{ GWh} - 100.8 \text{ GWh} = 130.5 \text{ GWh}$.

⁴ $(130.5 \text{ GWh} / 776.7 \text{ GWh}) * 100 = 16.8\%$.

development of the 2025 minimum storage limits did precede the 900 MW rated capacity increase of the LIL.

- d) Figure 3 compares the 2025 Minimum Storage Limits calculated on the assumption that the LIL was available at 900 MW with the limits used in 2025, which assumed a maximum power transfer capability of 700 MW. The lower limits reflect an average of 343 GWh of additional energy the increased LIL capacity would have provided the Island Interconnected System. This energy was not available during the period analyzed because the LIL maximum power transfer capability was limited to 700 MW. Hydro develops its minimum storage limits annually based on known system constraints, historic inflow sequences, generating plant availability, LIL availability, and system load forecasts. The limits are updated each year to reflect the expected energy capability of the system.

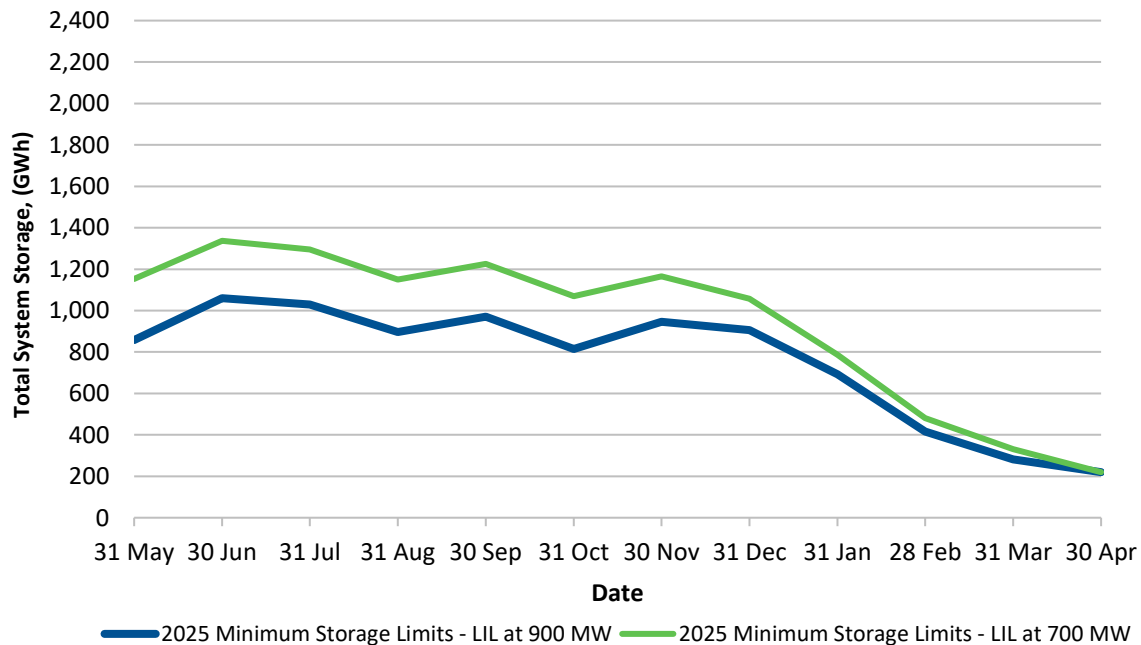


Figure 3: 2025 Minimum Storage Limits with LIL at 900 MW vs 700 MW

- e) The energy dispatch was determined using a maximum LIL flow of 700 MW. Increasing the LIL capacity from 700 MW to 900 MW, in isolation of other changes, does not have a material impact on the forecast.