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2026-08-31

Newfoundland and Labrador Hydro

Shirley Walsh

Email: shirleywalsh@nlh.nl.ca

Dear Ms. Walsh:

Re: Newfoundland and Labrador Hydro - 2027 Capital Budget Application - To NLH - Requests for Information

Enclosed are Requests for Information PUB-NLH-001 to PUB-NLH-068 regarding the above-noted application.

If you have any questions, please do not hesitate to contact the Board's Legal Counsel, Ms. Jacqui Glynn, by email, jglynn@pub.nl.ca or by telephone 709-726-6781.

Sincerely,

Mike McNiven

Board Secretary

MM/cj

ecc **Newfoundland Power Inc.**
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1 **IN THE MATTER OF the Electrical Power**
2 **Control Act**, 1994, SNL 1994, Chapter E-5.1
3 (the “**EPCA**”) and the **Public Utilities Act**, RSNL
4 1990, Chapter P-47 (the “**Act**”), as amended,
5 and regulations thereunder; and
6

7 **IN THE MATTER OF** an Application by
8 Newfoundland and Labrador Hydro for an
9 Order approving:

- 10 i) its capital budget for 2027, pursuant
11 to section 41(1) of the **Act**;
12 ii) its proposed capital purchases and
13 construction projects for 2027 in
14 excess of \$750,000, pursuant to
15 section 41(3)(a) of the **Act**;
16 iii) contributions by certain Customers
17 for contributions towards the cost of
18 improvements to certain property,
19 pursuant to section 41(5) of the **Act**,
20 and
21 iv) for an Order pursuant to section 78 of
22 the **Act**, fixing and determining its
23 average rate base for 2025.

**PUBLIC UTILITIES BOARD
REQUESTS FOR INFORMATION**

PUB-NLH-001 to PUB-NLH-068

Issued: August 31, 2026

General

PUB-NLH-001 Explain the basis for the difference in the Risk Mitigated value from the 2026 CBA, including any relevant differences in project scope and the respective pre- and post-implementation risk assessments for the following:

- a) Upgrade Core Information Technology Infrastructure (2027) and Upgrade Core Information Technology Infrastructure (2026).
- b) Overhaul Hydraulic Units (2027) and Overhaul Hydraulic Units (2026).
- c) Upgrade Power Transformers (2027–2028) and Upgrade Power Transformers (2026–2027).

PUB-NLH-002 Identify all 2027 CBA projects for which material construction or procurement activity will occur in Labrador. Explain how rates for construction services experienced in Labrador during 2025 and 2026 have been incorporated into the estimates for the 2027 CBA projects, including labour rates, contractor mobilization, accommodation, materials, escalation and contingency.

Schedule 1, 2027 Capital Budget Overview

PUB-NLH-003 **Reference: Charts 6 to 9, pages 15 to 17**

Provide a revised version of Charts 6 through 9 that compares SAIDI and SAIFI for the Central and Northern regions of the Island served by Hydro. With the reply, describe the service territory included in the Central and Northern regions.

PUB-NLH-004 **Reference: Table 7, page 23**

Explain why Refurbish Stage 1 Cooling Water Sumps (2027) was cancelled.

PUB-NLH-005 **Reference: Terminal Station Asset Management Strategy – 2026 Update, page 16**

Provide a status update of DGA installations and confirm if all installations will be complete by the end of 2027.

PUB-NLH-006 **Reference: Terminal Station Asset Management Strategy – 2026 Update, Table 1, page 20**

- (a) Provide a list of other radial transmission systems without bypass switches.
- (b) Provide Hydro's timeline and plan for installing bypass switches on the remaining radial transmission lines without bypass switches.

PUB-NLH-007 **Reference: Terminal Station Asset Management Strategy – 2026 Update, page 28**

Provide a list of all remaining assets that are protected by electromechanical and obsolete solid-state relays and Hydro’s plan and timeline to complete all replacements.

PUB-NLH-008 **Reference: Terminal Station Asset Management Strategy – 2026 Update, Appendix F**

For each of the following terminal station asset classes:

- Instrument transformers
- Switches
- Surge arresters
- Insulators
- Power transformers
- Circuit breakers

Provide, by year for the period from 2020 to 2025, the number of assets that (i) met Hydro’s applicable renewal criteria, (ii) were refurbished or replaced during the year, and (iii) met the applicable renewal criteria but remained in service at year-end.

Schedule 2, Five-Year Capital Plan including Major Projects (2027–2031)

PUB-NLH-009 **Reference: page 16**

For the Rigolet Diesel Generating Station:

- (a) Identify all capital work, including the year, scope and cost completed during the past five years (2022–2026) involving any replacement, upgrade or overhaul of the generating units.
- (b) Identify any planned capital work from 2027 onward, including the nature of the work, expected timing and estimated cost.
- (c) What alternatives, other than replacement, has Hydro considered for the Rigolet diesel plant?

Schedule 3, Holyrood Thermal Generating Station Overview

PUB-NLH-010 **Reference: page 4**

The Hatch Life Extension Condition Assessment Study (“LECA”) study completed in 2022 and updated in 2025 provided a capital expenditure plan to support the baseload operation of the Holyrood TGS to 2030.

Complete the table below, comparing the LECA 2022 and 2025 capital expenditure plan provided by Hatch to the actual and forecast capital expenditures for the Holyrood TGS.

	2022	2023	2024	2025	2026	2027	2028	2029	2030
2022 LECA									
2025 Update									
Actual									
Budget/Forecast									
Variance ¹									

¹ Note: Calculate variance as the difference between the Budget/Forecast or Actual amount less the 2025 Update amount.

PUB-NLH-011 Reference: Table 1, pages 8 and 9

Provide the preliminary outage schedule for the 2027 maintenance season identifying the start date, end date and duration of each of the programs and projects planned for in the 2027 CBA.

Schedule 5, 2026 Capital Expenditures Overview

- PUB-NLH-012**
- (a) Provide a summary table for all projects and programs with variances, showing the project or program title, year approved, approved budget amount, expenditures and forecast amount, forecasted variance amount and forecast variance percentage of budget amount.
 - (b) What controls has Hydro had in place to manage forecast variances? Address whether any portion of the costs could have been avoided or reduced through earlier planning, design, procurement or execution management, or recovered from suppliers.
- PUB-NLH-013**
- (a) Provide a table listing the number of projects, including project titles, that are over budget by 10%, 20%, 30%, 40% and 50% or more.
 - (b) Explain how Hydro determines when a project must be reconsidered and alternatives evaluated due to a cost increase, including whether there is an expenditure or variance threshold that trigger internal review and approval and the level of management authority required to approve expenditures beyond the Board approved amount.
 - (c) Explain how Hydro determines when it will notify the Board of a variance to the approved budget, including the circumstances in which Hydro may continue to incur expenditures above the approved budget without further Board approval, when a supplemental application or other Board approval is required, and how such variances are monitored and reported to the Board.

PUB-NLH-014 Reference: Upgrade Power Transformers (2025–2026), pages 5 and 6

Hydro has carried portions of a previously approved capital program forward into the same program in a future year.

- (a) How does Hydro adjust its approved budget to reflect the decreased scope of work resulting from the transfer of a portion of the approved scope of work to a future year's program?
- (b) What factors impact Hydro's decision to transfer a portion of an approved scope of work to a future year?

PUB-NLH-015 Reference: Overhaul Diesel Units (2026), pages 8 and 9

The advancement of materials procurement into 2026 is identified for three units scheduled for overhaul in 2027 at Paradise River (Unit 2094), Postville (Unit 2096) and Rigolet (Unit 2101).

- (a) The Overhaul Diesel Units (2026) program approved in the 2026 Capital Budget Application identified that overhauls were required for diesel gensets at Paradise River (Unit 585), Postville (Unit 2084) and Rigolet (Unit 2081). Are these the same diesel gensets identified here by different unit designations?
- (b) The Renew Diesel Units (2027) Program includes only Postville (Unit 2096) among the proposed 2027 units. Will the overhauls at Paradise River and Rigolet be completed under another program or project?
- (c) Provide the expenditure amount for materials procured in 2026 for the Paradise River, Postville and Rigolet units and explain how those expenditures are incorporated into the 2027 project or program estimates.
- (d) Explain how Hydro determined that purchasing replacement engines in advance of Board approval would not presume the outcome of the Board's consideration of the associated future capital work.
- (e) How does Hydro treat capital expenditures made in advance of project approval?
- (f) Are there other examples in the 2027 CBA where similar decisions were made to procure equipment in advance of project approval?

PUB-NLH-016 The response to PUB-NLH-065 in Hydro's 2026 General Rate Application indicates that the long-term plan for supplying Paradise River has not yet been determined.

- (a) Provide the rationale to advance material procurement in 2026 for Paradise River (Unit 2094) genset.
- (b) Provide the most recent assessment of the Paradise River diesel plant facility and the timeline for establishing a long-term plan.
- (c) Provide the historical background on the number of permanent residents required in a community to compel Hydro to provide service and if this is still relevant in determining the long-term plan for supply.

PUB-NLH-017 **Reference: Replace Light- and Heavy-Duty Vehicles (2024–2026), pages 18 and 19**

For the one heavy-duty vehicle that was ordered as part of the Replace Light- and Heavy-Duty Vehicles (2022–2024) program and received in 2025, why was this expenditure not reported as a carryover?

PUB-NLH-018 **Reference: Install Breaker Failure Protection (2025–2027) – Holyrood, page 27**

Explain why it is reasonable that estimates for deficiency work for breaker failure upgrades at Sunnyside and Oxen Pond Terminal Stations are included in this project.

PUB-NLH-019 **Reference: Install Ultra-Fast DC Electric Vehicle Charges (2023-2025) – Supplemental, page 19**

Confirm that the capital expenditures for this project are not proposed for inclusion in regulated rate base for recovery from customers, including the amount of the reported variance.

Schedule 5, 2026 Capital Expenditures Overview, Appendix A

PUB-NLH-020 **Reference: page 1, lines 6 and 9 – 10, Appendix A**

Provide a separate table listing the projects and programs included in Appendix A that were budgeted under \$750,000 and are now forecast to exceed \$750,000. Include in the table the Project/Program title, the original budget amount, the forecast expenditure amount, variance amount and detailed variance explanation for each project and program that is forecast to exceed \$750,000.

Schedule 5, 2026 Capital Expenditures Overview, Appendix B, Capital Expenditures and Carryover Report for the Year Ended December 31, 2025

PUB-NLH-021 **Reference: Table 1, page B-9**

How does Hydro align Expenditures with Approved Budget amounts for projects and programs that are advanced to a future year's program? In the response, provide actual examples from the 2016 to 2025 period.

PUB-NLH-022 **Reference: Table 2 and Chart 3, page B-23**

Table 2 and Chart 3 show for all ranges of materiality that the number of completed projects did not attain the planned number of projects. What

initiatives have Hydro undertaken to address this deficiency and improve their record of project completion?

PUB-NLH-023 **Reference: Overhaul Turbine and Valves – Unit 3 (2025) – Holyrood, page B-47**

Explain why the same variance explanation appears in both the Capital Expenditures and Carryover Report for the Year Ended December 31, 2025 and the 2026 Capital Expenditures Overview.

PUB-NLH-024 **Reference: Overhaul Unit 1 Turbine Valves and Generator (2024) – Holyrood, pages B-48 and B-49**

Is any portion of the budget, expenditure or variance for the Overhaul Unit 1 Turbine Valves and Generator (2024) – Holyrood included in the cost associated with the supplemental capital project to Replace Unit 1 and 2 Last Stage Turbine Blades – Holyrood?

PUB-NLH-025 **Reference: Perform Major Inspection – Synchronous Condenser 2 (2025–2026) – Wabush, page B-55**

The original project budget was for \$22,800 in 2025 and \$572,800 in 2026, for a total project budget of \$595,600.

- (a) Provide a table showing the budget, expenditures and variance for both years of the multi-year project incorporating the expenditures associated with the unexpected failure of the Synchronous Condenser 2 rotor poles.
- (b) Explain why the Allowance for Unforeseen Items was not used for the expenditures related to the failure of the Synchronous Condenser 2 rotor poles.

PUB-NLH-026 **Reference: Upgrade SCADA Network (2024), pages B-80 and B-81**

Additional SCADA devices were needed on the Great Northern Peninsula and in Labrador. Provide a listing of terminal stations added and the type of devices that are now under remote monitoring and control as a result of this expansion of the SCADA network.

Schedule 7, Capital Programs and Projects

Program 1: Wood Pole Line Management (2027), page 3

PUB-NLH-027 In Hydro's General Rate Application, Hydro's Depreciation Consultant, Concentrics Advisors ULC, ("Concentrics") determined that the historic life of 43 years for wood poles appeared too short and recommended that 50 years

is more suitable for future expectations resulting in a life extension for Hydro's wood poles of 7 years from 43 to 50 years.

Explain the difference in life extension potential for wood poles between Hydro and its consultant.

Program 1: Wood Pole Line Management (2027), Appendix A, Plan for Wood Poles Greater than 55 years old

PUB-NLH-028 The survivor curve provided by Concentrics in Hydro's 2026 GRA suggests that approximately 5% of poles would survive to 80 years in service. Almost 50% of the transmission lines in Table 1 on page A-2 have an average pole age at retirement that meets or exceeds 80 years.

Discuss whether the Concentric recommendation of a historic life of 50 years and a survival rate at 80 years impacts the WPLM program and Hydro's approach to aging wood poles.

PUB-NLH-029 Further to Table 1 on page A-2, provide a second table for each transmission line identifying the number of poles to be replaced by year.

Program 2: Distribution System In-Service Failures, Miscellaneous Upgrades and Street Lights (2027)

PUB-NLH-030 **Reference: page 2**

Does Hydro undertake regular inspections and maintenance on distribution equipment such as substation transformers, voltage regulators and reclosers? If yes, explain how deteriorating equipment cannot be identified in advance through inspections and maintenance.

Program 3: Provide Service Extensions (2027)

PUB-NLH-031 **Reference: Chart 1, page 2**

What caused the significant increase in the new service requests received in 2025?

PUB-NLH-032 **Reference: Chart 3, page 5**

Why is the cost per unit higher in 2024 compared to all other years?

Program 5: Replace Light-Duty Vehicles (2027–2028)

PUB-NLH-033 Reference: Chart 3, page 5

Provide details for the significant increase in the cost per unit for light-duty vehicles addressing whether Hydro has changed its vehicle specifications.

Program 6: Renew Diesel Units (2027)

PUB-NLH-034 Reference: page 1

Hydro states that the program to Renew Diesel Units will consider the alternative of overhaul or replacement for each required renewal activity at the estimate stage, and confirm the approach during program execution.

- (a) Provide all research and analysis completed by Hydro that supports this change, including cost benefit analysis, least cost analysis supported by NPV analysis, jurisdiction review of other Canadian utilities service prime power diesel communities, etc.
- (b) Provide examples of how renewal of a unit under the 2027 program will differ from the overhaul of a unit under the 2026 overhaul program.
- (c) Describe and quantify the reliability gains obtained through a renewal in the 2027 program versus the reliability gains obtained through an overhaul under the 2026 program.
- (d) Provide a cost comparison of the individual genset renewals proposed in the 2027 program with the overhaul approach performed in the manner contemplated in the 2026 project.

PUB-NLH-035 Over the past 10 years, provide a summary of diesel genset overhauls where the failure of parts shortly after return to service caused an extended outage. Confirm who provided the parts and labour and if warranty coverage was provided.

PUB-NLH-036 Reference: pages 1 and 2

Hydro states that the Renew Diesel Units program will consider the alternative of overhaul or replacement for each required renewal activity at the estimate stage.

- (a) With the change to the program, explain the basis for the 2027 estimate and how changes in historical average costs were considered (i.e. overhaul costs versus replacement costs).
- (b) Has Hydro considered the impact of supply chain issues if diesel genset replacement is required, and what alternatives are available if replacement units are not readily available?

PUB-NLH-037 How long does it typically take to complete a diesel genset overhaul?

Program 9: Replace Protective Relays (2027–2028)

PUB-NLH-038 Provide a status update on the number of relays replaced to date, the number of relays yet to be replaced and when Hydro anticipates it will have completed the replacement of all electromechanical protective relays.

Program 10: Terminal Station In-Service Failures (2027)

PUB-NLH-039 Reference: page 2

Provide a list of all spare assets maintained in inventory for this program.

Program 11: Purchase Tools and Equipment (2027)

PUB-NLH-040 Reference: Chart 4, page 7

Provide the methodology used by Hydro to calculate the 2027 budget including whether it was based on historical expenditures or 2027 requirements.

Program 13: Purchase Personal Computers (2027)

PUB-NLH-041 Reference: page 4 and Chart 3, page 5

Is Hydro increasing the total number of rugged devices and workstations corporately? If yes, where are these rugged devices and workstations being deployed?

Program 14: Replace Disconnects (2027–2029)

PUB-NLH-042 Reference: page 2

What is industry practice with respect to the replacement of disconnect switches?

PUB-NLH-043 Reference: page 2, lines 26-27

Hydro monitors the condition of its switches by conducting regular visual inspections of the units and reviewing reports completed by field staff who operate these switches.

(a) Provide a sample report for both a disconnect switch with and without deficiencies.

(b) Are disconnect switches operated during the visual inspection? If not, what can be assessed by the visual inspection of a normally open or normally closed disconnect switch?

Program 16: Perform Facilities Refurbishments (2027)

PUB-NLH-044 Reference: List of Appendices, page ii

Hydro has provided condition assessments for the five facilities with work planned for 2027, with three of these condition assessments completed in 2017 and 2018.

- (a) Should new condition assessments be completed given the age of the assessments for three of the facilities.
- (b) How will Hydro address additional scope and expenditures that may be required?

PUB-NLH-045 Reference: Section 3.2 Asset Condition, pages 5 to 9

Hydro is proposing facility refurbishments at four facilities that were also included in the 2026 CBA Perform Facilities Refurbishments program.

- (a) Explain how the scope of work and budget in 2027 is different and why each facility requires revisiting in 2027?
- (b) How does completing scopes of work at the same facility over multiple years impact costs and efficiency?

PUB-NLH-046 Reference: Section 3.2 Asset Condition, pages 5 to 9

In the 2027 CBA, for the Ramea Diesel Generating Station Powerhouse Hydro is proposing to undertake detailed engineering design of proposed refurbishments for the building structure in 2027, with execution of the refurbishment work to be completed in a future year.

Explain why the Board should approve an amount for detailed engineering design work in advance of reviewing the specific project scope of work.

PUB-NLH-047 Reference: Stephenville Main Office Building, Garage, and Warehouse, page 7

Would the replacement of a hot water tank be considered an operating expense in the normal course of building maintenance?

PUB-NLH-048 Reference: Program Budget, Table 3, page 13

Provide an expenditure breakdown similar to Table 3 for each of the 5 facilities included in the 2027 Perform Facilities Refurbishments program.

PUB-NLH-049 Reference: Appendix G, Facilities Management Jurisdictional Scan

As requested in Order No. P.U.2(2026), provide a report that summarizes the jurisdictional scan, analyses the various methodologies employed by other utilities, and provides the Board a reasoned approach to be undertaken by Hydro going forward in assessing and estimating capital expenditures for Facilities Refurbishment.

Program 20: Upgrade Energy Management System (2027–2028) – Hydro Place

PUB-NLH-050 Reference: Table 2, page 4

Is the cost of the Energy Management System incurred 100% by regulated Hydro? Please explain.

Project 1: Refurbish MD-1 (2027–2030) - Ebbegunbaeg

- PUB-NLH-051**
- (a) Are there any populated communities downstream of MD1 that would be placed at risk if the dam were to fail and could the failure create a cascading effect on other structures which in turn could impact other populated communities?
 - (b) Why was this project not included in the 2026 – 2030 Planned capital Work for Bay d’Espoir?

Project 7: Upgrade Worst-Performing Distribution Feeders (2027–2028)

- PUB-NLH-052**
- Table 1: Five-Year Average Reliability Data for FDL-L1 (2021–2025) compares the reliability performance of FDL-L1 to the reliability performance of Hydro.
- (a) Which areas of service territory is included in the Hydro data in the second line of the table?
 - (b) Replace the Hydro aggregate data with data for each of the Central, Northern and Labrador regions of Hydro’s service territory.

PUB-NLH-053 Reference: Appendix A, page A-6

Similar to FDL-L1, St. Anthony, Line 1 has a recommendation for capital work to replace failing, aged insulators and replace St. Anthony, Line 1 sub-standard conductor. Hydro states that it plans to propose this work in a future CBA. Why wasn’t the work recommended for St. Anthony, Line 1 included in the 2027 CBA?

Project 9: Refurbish Intake Access Road (2027–2028) - Bay d'Espoir

PUB-NLH-054 Reference: pages 7 and 9

Describe the security in place at the Bay d'Espoir site and if public access is controlled to any extent. Include whether public access to Camp Boggy Road is available from an insecure access point.

Project 12: Inspect Fuel Storage Tanks (2027–2028) - Makkovik

PUB-NLH-055 Reference: page 5

- (a) How many years of useful service life are remaining for fuel storage tanks 7D, 7E, 7F, and 7G?
- (b) What is the estimated replacement cost for each of the 4 fuel storage tanks?

Project 13: Refurbish Aluminum Towers – TL212 (2027–2028)

PUB-NLH-056 Reference: page 4

- (a) Describe Hydro's inspection and maintenance program for aluminum towers.
- (b) Describe any relationship that may exist with the annual Wood Pole Line Management program.

Project 14: Renew Distribution Feeders (2027–2028)

PUB-NLH-057 Reference: page 4

Provide the reliability data (SAIFI, SAIDI and CHI) for St. Brendan's Line 1 ("SBN-L1").

Project 15: Replace Heavy-Duty Mobile Equipment (2027–2028)

PUB-NLH-058 Reference: Table 1, page 10

- (a) Provide all of the assumptions and data used by Hydro to calculate the NPV of the Existing Process (Rental) alternative.
- (b) How many years are included in the NPV analysis?

Project 16: Replace T1 (2027–2029) – Burgeo

PUB-NLH-059 Reference: page 2

Has Hydro explored additional corrosion protection for the new transformer?

Project 23: SWOP Replacements (2027-2028)

PUB-NLH-060 Reference: page 2

Hydro plans to acquire and implement a new safety and health solution to replace the existing SWOP application, but the scope of the project will be reviewed and finalized when the procurement process has been completed.

- (a) Without a defined scope in place, what is the basis of the \$1,509,700 cost estimate for the project?
- (b) Will Hydro complete a survey of other Canadian utilities to identify applications used for managing safety, health, and environmental observations and incidents as part of the review process?
- (c) Will Hydro explore with Newfoundland Power sharing arrangements with their software system for managing safety, health, and environmental observations and incidents to ensure the replacement of the SWOP application is done at least cost?

Project 25: Distribution Equipment SCADA Additions – Phase I (2027–2028)

PUB-NLH-061 Reference: page 1

What are the differences between Hydro’s Supervisory Control and Data Acquisition (“SCADA”) system and its Energy Management System (“EMS”)?

PUB-NLH-062 Has Hydro developed a comprehensive plan to increase the percentage of distribution equipment connected to its SCADA system? If yes, provide a copy of the plan. If not, why not?

PUB-NLH-063 Quantify the amount of delay in outage restoration due to the lack of remote operating and monitoring capability using SAIDI and CHI.

PUB-NLH-064 Does Hydro intend to implement any operational changes to reduce the delays in outage restoration time to customers as a result of improved remote operating and monitoring capability?

PUB-NLH-065 Reference: pages 2 and 3

Provide a preliminary list of electrical distribution equipment to be connected to the SCADA system at each of the terminal stations listed.

PUB-NLH-066 **Reference: page 3**

Provide a copy of the distribution automation strategy.

PUB-NLH-067 **Reference: Appendix A**

Provide the rankings for all distribution substation equipment based on the methodology outlines in Appendix A.

Project 27: Migrate Legacy Applications (2027)

PUB-NLH-068 Table 1: 2027 Proposed Application Replacements identifies 10 software applications proposed for replacement.

- (a) Can any of the software applications proposed for replacements be incorporated into other applications (for example, Human Resource application, Customer Service application, etc.) currently used by Hydro?
- (b) Has Hydro explored with Newfoundland Power sharing arrangements with similar software applications to ensure the migration of legacy applications is done at least cost?

BOARD OF COMMISSIONERS OF PUBLIC UTILITIES

Per



Mike McNiven
Board Secretary