

October 3, 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: Approval of a contribution from Newfoundland and Labrador Hydro (“Hydro”) towards the cost of relocating portions of Newfoundland Power Inc. (“Newfoundland Power” or the “Company”) Transmission Lines 38L and 39L**

### ***The Application***

Please find enclosed the application of Newfoundland Power Inc. for approval of a contribution from Hydro toward the cost of relocating portions of transmission lines 38L and 39L at the request of Hydro (the “Relocate Request”).

### ***38L and 39L Relocation Project***

Hydro is the primary supplier of electricity for the Province of Newfoundland and Labrador. In Board Order No. P.U. 17 (2025), Hydro received approval from the Board of Commissioners of Public Utilities (the “Board”) for the capital expenditures for the early execution work related to the future construction of the Avalon Construction Turbine. Hydro’s early execution capital work includes re-routing some of Newfoundland Power’s existing transmission lines to facilitate site construction.

### ***Process Matters***

The Relocate Request is proceeding under the *Transmission Line Maintenance* program, approved as part of Newfoundland Power’s *2025 Capital Budget Application*.<sup>1</sup> This program includes a component to accommodate third-party requests to relocate or replace sections of

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<sup>1</sup> Order No. P.U. 27 (2024).

transmission lines.<sup>2</sup> The forecast cost for work associated with the Relocate Request was included in the variance notes for the previously-approved 2025 Transmission Line Maintenance program, filed with the *2025 Capital Expenditure Status Report*.<sup>3</sup>

Newfoundland Power considers the Relocate Request to be a request pursuant to Clause 9(c) of the Company's *Schedule of Rates, Rules & Regulations* (the "Rates, Rules & Regulations"). Clause 9(c) provides that, when a customer requests the relocation of any Newfoundland Power facility, the customer is required to pay for the estimated cost of the relocation, less any betterment. Section 41(5) of the *Public Utilities Act* (the "Act") states that Newfoundland Power must seek approval of the Board to collect from Hydro its required contribution to the relocation.

The construction cost of the proposed line relocation less any betterment, based on a detailed engineering estimate, is \$1,012,231 (excluding HST).

### ***Concluding***

A draft of the Order requested is enclosed for the Board's convenience. Should you have any questions, please contact the undersigned.

Regards,



Siobhan Donovan  
Manager Regulatory Affairs  
Encl.

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<sup>2</sup> See the Company's *2025 Capital Budget Application*, Schedule B, page 88.

<sup>3</sup> See the *2025 Capital Expenditure Status Report*, Appendix A filed as part of the Company's *2026 Capital Budget Application*.

### **Newfoundland Power Inc.**

55 Kenmount Road • P.O. Box 8910 • St. John's, NL A1B 3P6

PHONE (709) 853-6251 • FAX (709) 737-2974 • [sdonovan@newfoundlandpower.com](mailto:sdonovan@newfoundlandpower.com)

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

**IN THE MATTER OF** a request by Newfoundland and Labrador Hydro (“Hydro”) to relocate portions of Newfoundland Power Inc. (“Newfoundland Power or the “Company”) Transmission Lines 38L and 39L (the “Relocate Request”); and

**IN THE MATTER OF** an application by Newfoundland Power pursuant to section 41 of the Act seeking approval of a contribution from Hydro toward the cost of the relocation.

**TO:** The Board of Commissioners of Public Utilities (the “Board”)

**THE APPLICATION OF** Newfoundland Power Inc. (the “Applicant”) **SAYS THAT:**

**A. Introductory**

1. Newfoundland Power is a corporation duly organized and existing under the laws of the Province of Newfoundland and Labrador, is a public utility within the meaning of the Act, and is subject to the provisions of the EPCA.
2. Newfoundland Power operates transmission lines, distribution lines and substations to deliver electricity to customers throughout its service territory on the island portion of the Province of Newfoundland and Labrador.

**B. Transmission Line Relocation**

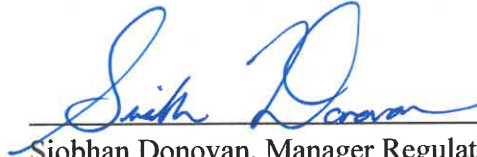
3. Hydro is a corporation continued and existing under the *Hydro Corporation Act, 2024*, is a public utility within the meaning of the Act, and is subject to the provisions of the EPCA.
4. Hydro is planning to construct a new 150MW Combustion Turbine resource with renewable fuel capabilities on the Avalon (“Avalon CT”).
5. In Order No. P.U. 17 (2025), Hydro received approval from the Board for the capital expenditures for the early execution work related to the future construction of the Avalon

CT, which includes re-routing some of Newfoundland Power's existing transmission lines to facilitate site construction.

6. Hydro has requested that Newfoundland Power relocate portions of Newfoundland Power's transmission lines 38L and 39L to accommodate the construction of the Avalon CT. Schedule A to this Application contains a detailed drawing of the Transmission Line relocations.
7. The Relocate Request will be completed as part of the *Transmission Line Maintenance* program approved as part of Newfoundland Power's *2025 Capital Budget Application* in Order No. P.U. 27 (2024). Accordingly, no approval is requested herein with respect to the capital expenditures associated with the Relocate Request.
8. Newfoundland Power considers Hydro's Relocate Request to be a request pursuant to Clause 9(c) of its *Schedule of Rates, Rules and Regulations*. Clause 9(c) requires Hydro to pay for the estimated cost of relocation less any betterment.
9. The amount of Hydro's required contribution to the Relocate Request is based on a detailed engineering estimate. The estimated construction cost of the relocation, less any betterment, is \$1,012,231 not including applicable HST. Schedule B to this Application sets out the calculation of Hydro's required contribution to the costs of the Relocate Request.
10. Pursuant to subsection 41(5) of the Act, Newfoundland Power is required to apply to the Board for approval to collect from Hydro its required contribution to the Relocate Request.
11. Newfoundland Power therefore requests that the Board approve the contribution from Hydro toward the cost of the relocation all as calculated in Schedule B to this Application.
12. Communications with respect to this Application should be forwarded to the attention of Siobhan Donovan, Manager Regulatory Affairs at Newfoundland Power.

**DATED** at the City of St. John's, Newfoundland and Labrador, this 3<sup>rd</sup> day of October, 2025.

**NEWFOUNDLAND POWER INC.**



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Siobhan Donovan, Manager Regulatory Affairs

Newfoundland Power Inc.

P.O. Box 8910

55 Kenmount Road

St. John's, NL A1B 3P6

Telephone: (709) 853-6251

Telecopier: (709) 737-2974

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

**IN THE MATTER OF** a request by Newfoundland and Labrador Hydro (“Hydro”) to relocate portions of transmission lines (the “Relocate Request”); and

**IN THE MATTER OF** an application by Newfoundland Power Inc. (“Newfoundland Power” or the “Company”) pursuant to section 41 of the Act seeking approval of a contribution from Hydro toward the cost of the relocation.

#### **AFFIDAVIT**

I, Michael Comerford, of the City of Mount Pearl, in the Province of Newfoundland and Labrador make oath and say as follows:

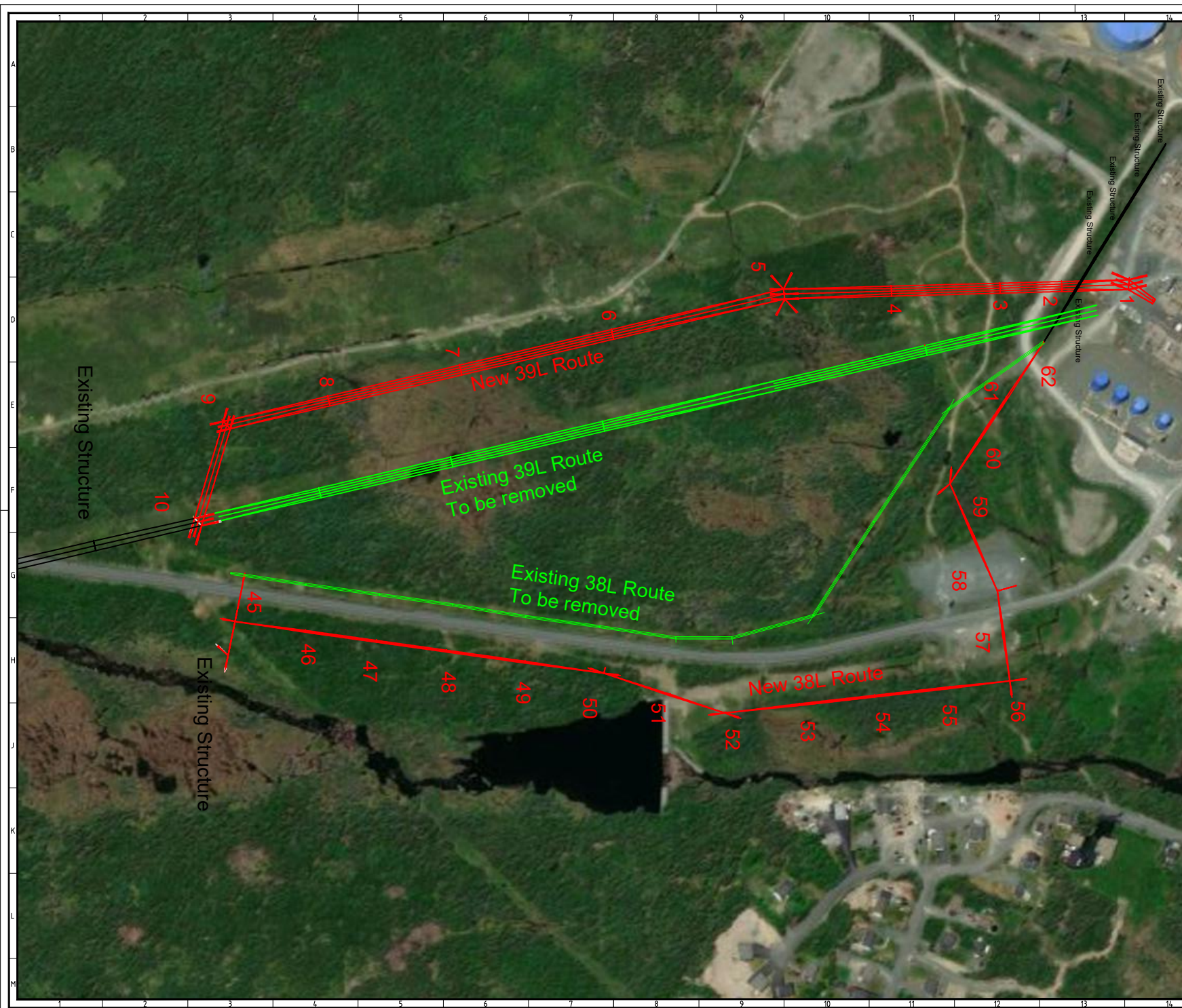
1. That I am Director, Planning and Supply of Newfoundland Power Inc.;
2. That I have read and understand the foregoing Application; and
3. That, to the best of my knowledge, information and belief, all matters, facts and things set out in this Application are true.

**SWORN** to before me at the  
City of St. John's, in the  
Province of Newfoundland and Labrador  
on this 3<sup>rd</sup> day of October, 2025:

  
Siobhan Donovan  
Barrister, NL

  
Michael Comerford, P. Eng





NOTES:

DWG #	TITLE	
REFERENCE DRAWINGS		
08/01/2025	ORIGINAL ISSUE	JOR
REV	DATE	DESCRIPTION
		APPROVED
REVISION HISTORY		
<div><div>NEWFOUNDLAND</div><div><b>POWER</b></div><div>A FORTIS COMPANY</div></div>		
SITE: 38L & 39L - Relocation		
PROJECT:	38L & 39L Relocation 2025	PROJECT # 1870430
TITLE: 38L & 39L RELOCATION (2025) PROPOSED LAYOUT		
REV DESCRIPTION: Preliminary Design		
DESIGNED: JOR	CHECKED: N/A	
DRAWN: JOR	APPROVED:	
SCALE: NTS	DRAWING NUMBER 1-39-38-8-1	REVISION <b>C</b>
DATE: 2025/08/01	3 OF 3	

**CONTRIBUTION IN AID OF CONSTRUCTION  
TRANSMISSION RELOCATION**

**Customer:** Newfoundland and Labrador Hydro  
**Location:** Thermal Plant Road, Holyrood

**Basis of Estimate** Relocate Transmission Line 38L  
Relocate Transmission Line 39L

Transmission Line 38L Relocate	\$	684,763
Transmission Line 39L Relocate	\$	924,968
Total Construction Cost	\$	<u>1,609,731</u>
Less: Remaining Life Credit	\$	(597,500)
Contribution by Customer <sup>1</sup>	\$	<u><u>1,012,231</u></u>

<sup>1</sup> If actual construction costs differ from the estimate, the Customer will be charged (or refunded) for that amount.



**CONTRIBUTION IN AID OF CONSTRUCTION  
TRANSMISSION RELOCATION**

**Customer:** Newfoundland and Labrador Hydro  
**Location:** Thermal Plant Road, Holyrood

**Basis of Estimate** Relocate Transmission Line 38L

Poles and Framing	\$ 141,034
Tree Trimming/Brush Clearing	\$ 45,864
Surveying	\$ 9,138
Total Material & Other Costs	<u>\$ 196,036</u>
Labour Costs	
Labour (NL Power)	\$ 85,764
Contract Labour	\$ 333,551
Total Labour Costs	<u>\$ 419,315</u>
Total Material, Labour & Other Costs	\$ 615,351
GEC (4%)	\$ 24,614
Total Construction Costs	<u>\$ 639,965</u>
Operating & Maintenance (7.0%)	\$ 44,798
Total Costs	<u><u>\$ 684,763</u></u>
Less: Remaining Life Credit	\$ (349,218) <sup>1</sup>
Total CIAC	<u>\$ 335,545</u>

<sup>1</sup> Based on factor of 81.8% for 57-year old transmission line.

# **CONTRIBUTION IN AID OF CONSTRUCTION TRANSMISSION RELOCATION**

**Customer:** Newfoundland and Labrador Hydro  
**Location:** Thermal Plant Road, Holyrood

**Basis of Estimate** Relocate Transmission Line 39L

Poles and Framing	\$	299,656
Tree Trimming/Brush Clearing	\$	45,864
Surveying	\$	12,198
Total Material & Other Costs	\$	357,718
Labour Costs		
Labour (NL Power)	\$	66,578
Contract Labour	\$	406,912
Total Labour Costs	\$	473,490
Total Material, Labour & Other Costs	\$	831,208
GEC (4%)	\$	33,248
Total Construction Costs	\$	864,456
Operating & Maintenance (7.0%)	\$	60,512
Total Costs	\$	924,968
Less: Remaining Life Credit	\$	(248,282) <sup>1</sup>
Total CIAC	\$	676,686

<sup>1</sup> Based on factor of 68.9% for 48-year old transmission line.

**NEWFOUNDLAND AND LABRADOR  
BOARD OF COMMISSIONERS OF PUBLIC UTILITIES**

**AN ORDER OF THE BOARD**

**NO. P.U. \_(2025)**

1 **IN THE MATTER OF** and the *Public Utilities Act*,  
2 RSNL 1990, Chapter P-47 (the “Act”) and the  
3 *Electrical Power Control Act, 1994*, SNL 1994,  
4 Chapter E-5.1 (the “EPCA”); and  
5

6 **IN THE MATTER OF** a request by Newfoundland  
7 and Labrador Hydro (“Hydro”) to relocate portions  
8 of transmission lines (the “Relocate Request”); and  
9

10 **IN THE MATTER OF** an application by  
11 Newfoundland Power Inc. (“Newfoundland Power”  
12 or the “Company”) pursuant to section 41 of the  
13 Act seeing approval of a contribution from Hydro  
14 toward the cost of the relocation.  
15

16 **WHEREAS** Newfoundland Power is a corporation duly organized and existing under the  
17 laws of the Province of Newfoundland and Labrador, is a public utility within the meaning  
18 of the Act, and is also subject to the provisions of the EPCA; and  
19

20 **WHEREAS** Hydro is planning to construct a new 150MW Combustion Turbine resource  
21 with renewable fuel capabilities on the Avalon Peninsula (“Avalon CT”); and  
22

23 **WHEREAS** In Order No. P.U. 17 (2025), Hydro received approval from the Board for the  
24 capital expenditures for the early execution work related to the future construction of the  
25 Avalon CT; and  
26

27 **WHEREAS** Hydro’s Relocate Request entails the relocation of a portion of Newfoundland  
28 Power’s transmission lines 38L and 39L, to accommodate the construction of the Avalon CT;  
29 and

**WHEREAS** as per Clause 9 (c) of the Newfoundland Power Inc. Schedule of Rates, Rules & Regulations (the “Rates, Rules & Regulations”) provides that, when a customer requests the relocation of any Newfoundland Power facility, the customer is required to pay for the estimated cost of the relocation less any betterment; and

**WHEREAS** the estimated construction cost of the relocation, less any betterment, is \$1,012,231 excluding HST and subsection 41 (5) of the Act states that Newfoundland Power shall not collect the contribution from Hydro without the prior approval of the Board;

**IT IS THEREFORE ORDERED THAT:**

Pursuant to section 41(5) of the Act, the Board approves the contribution from Hydro towards the cost of the relocation, in the amount of \$1,012,231 excluding HST; and

Newfoundland Power shall pay all expenses of the Board arising from this Application.

**DATED** at the City of St. John’s, Newfoundland and Labrador, this \_\_\_\_ day of \_\_\_\_, 2025.

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Jo-Anne Galarneau  
Executive Director and Board Secretary