IN THE MATTER OF the *Public Utilities Act* (the *"Act"*);

AND

IN THE MATTER OF an application by Newfoundland Power Inc. for an Order pursuant to sections 41 and 78 of the Act: (a) approving its 2026 Capital Budget; and (b) fixing and determining its 2024 rate base.

CONSUMER ADVOCATE
REQUESTS FOR INFORMATION
CA-NP-001 to CA-NP-093

Issued: August 19, 2025

CA-NP-001 (Reference Application, para. 2)

a) Is NP requesting Board approval of capital expenditures totaling $196,647,000 in the 2026 Capital Budget Application including $140,389,000 in new expenditures (includes $40,848,000 which would be expended in 2027 and $8,040,000 in 2028) and $56,258,000 for projects that were previously approved by the Board?

b) Please provide a comparison of the expenditures in part a) relating to the 2026 CBA to comparable figures in the 2025 CBA, both proposed and approved, and show the increase in both dollars and percent.

c) Please identify any other capital expenditures in 2026 that are not included in these figures such as expenditures for which NP anticipates seeking approval through supplemental capital budget applications.

CA-NP-002 (Reference Application) Please provide a table of annual values from 1994 to 2027 inclusive (with forecasts for 2025 through 2027) for the following items: NP's net plant investment, NP's rate base, number of customers, the GDP deflator, net plant investment expressed in real terms using the GDP deflator, rate base expressed in real terms using the GDP deflator, net plant in real terms per customer, and real rate base per customer.

CA-NP-003 (Reference Application) Please provide a table of the annual values from the years 1994 to 2027 inclusive (with forecasts for 2025 through 2027) for the following items: NP's total capital expenditure, the GDP deflator, NP's total capital expenditure expressed in real terms using the GDP deflator, the number of customers, real capital expenditures per customer, and number of employees (full-time equivalent).

CA-NP-004 (Reference Application) For the years 2000 to 2024, please provide a table giving annual values for the following: NP's total internal labour cost; the percentage change in NP's total internal labour cost over prior year; the percentage change in the GDP deflator; the provincial inflation rate (NL CPI based); and NP's internal labour inflation rate.

CA-NP-005 (Reference Application) Please provide a table of annual values from 1994 to 2024 that gives NP's CBA's proposed single-year expenditure, the amount of that expenditure that was approved, and actual expenditure.

CA-NP-006 (Reference Application) Please provide a table and graph showing for the years 1994 through 2027 (forecasts for the years 2025 through 2027) NP's annual gross operating cost, operating expenses, and depreciation cost.

CP-NP-007 (Reference Application) For each year from 1994 to 2027 (with estimates/forecasts for 2025 through 2027), please provide the following:

a) A table showing the total number of NP customers by customer class, with

the domestic customers decomposed by regular and all electric.

b) A table showing the annual total sales, in MWh, to each group of customers as requested in (a).

c) A table showing the annual total sales, in MWh, per customer for each group of customers as requested in (a).

CA-NP-008 (Reference Application) For July 2015 to June 2025, please provide a table showing monthly electricity sales (kWhs) per customer for domestic regular customers, domestic all-electric customers, each class of GS customers, and street-lighting customers.

CA-NP-009 (Reference Application) Please provide a table showing for each year from 1994 to 2025 the capital budget amounts proposed by NP in its capital budget applications and approved by the Board, and identifying the specific projects and budget amounts that were not approved along with the reasons given by the Board for rejecting the capital expenditure(s).

CA-NP-010 (Reference Application) Please provide a list of the dates for all oral/public hearings that the Board has held on NP's capital budget applications since 1994.

CA-NP-011 (Reference Application) The Board, in Order No. P.U. 36 (2021) "*acknowledged the rate pressures which are expected in association with the commissioning of the Muskrat Falls Project. The Board believes that, given the circumstances, both Newfoundland Power and Hydro should renew their efforts to provide evidence which demonstrates that every effort is being made to reduce costs for customers while ensuring the continued provision of reliable service.*"

a) Please explain NP efforts to reduce costs for customers in the 2026 CBA in light of rate pressures brought on by Muskrat Falls, NP's 2025-2026 GRA and Hydro's Build Application.

b) Please provide any documentation from NP senior management to line managers with respect to the 2026 CBA relating to budget control, prioritization and cost efficiencies in light of current rate pressures brought on by the Muskrat Falls Project, NP's 2025-26 GRA and Hydro's Build Application.

CA-NP-012 (Reference Application) On December 20, 2021 the Board issued its Provisional Capital Budget Application Guidelines. In its cover letter the Board states "*The Board is enclosing provisional Capital Budget Application Guidelines to be used in 2022 for the 2023 capital budget applications as well as other matters related to the Board's oversight of utility capital expenditures.*" The Board goes on to state "*The provisional guidelines were developed based on the work completed to date in the Board's Capital Budget*

Application Guidelines Review which began in 2019."

a) Are the Provisional Guidelines still relevant? What direction has the Board provided with respect to guidelines that are to be used in NP's 2024, 2025 and 2026 capital budgets?

b) For each of its 2023, 2024, 2025 and 2026 capital budgets please identify each change that NP has made to bring its capital budgets in line with the requirements set out in the December 20, 2021 Provisional Capital Budget Application Guidelines.

CA-NP-013

(Reference Application) On December 20, 2021 the Board issued its Provisional Capital Budget Application Guidelines. In its cover letter the Board states "*Before the provisional guidelines are finalized and the review is concluded, the Board will seek further input from the participants.*" It goes on to say "*The Board will establish the process for the conclusion of the capital budget guidelines review next year when there is more clarity as to the scope of the Government's review and the impact of the renewable energy plan.*" Please identify each communication that NP has received from the Board with respect to finalizing the Provisional Guidelines.

CA-NP-014

(Reference Application) In the Provisional Guidelines it is stated (page 2 of 18) "*The information to be provided in an annual capital budget application and the format for this information is set out in Appendix A. Where a utility is not able to provide the required information it shall provide an explanation as to why the information cannot be provided as well as the basis upon which the proposals should be approved in the absence of this information.*" Please identify each instance in the 2026 CBA where NP is not able to provide the required information.

CA-NP-015

(Reference Application) In the Provisional Guidelines it is stated (page 15 of 18) with respect to the assessment of alternatives "*Defer project and maintain status quo addressing, to the extent possible, the risk of deferral for one or more years, in terms of reliability impact, safety, human resource requirements, and the impact on other capital projects.*" On pages 16 of 18 and 17 of 18 of the Provisional Guidelines it is stated "*Projects and programs shall be evaluated for risk mitigation in the following categories: 1) Reliability 2) Safety 3) Environment. Risk mitigation shall be calculated as the difference in risk before and after the proposed alternatives were implemented. The calculation of risk shall conform to an internationally recognized standard for calculating risk.*"

a) Please provide a table summarizing for each project and program in the 2026 CBA the risk quantified in terms of reliability impact, safety, human resource requirements, and the impact on other capital projects.

b) If NP is unable to quantify the risk in these terms, please explain why, given that this is the fourth capital budget submitted under the Provisional

Guidelines and that it has been 6 years since the Board initiated its review of the Guidelines in 2019. When does NP expect to be in a position to do so?

CA-NP-016 (Reference Application) Please provide the risk mitigation value provided by NP's asset management program (i.e., the difference between baseline risk and residual risk) used to develop its 2026 CBA.

CA-NP-017 (Reference Application) Please provide the reliability improvement resulting from NP's asset management program used to develop its 2026 CBA.

CA-NP-018 (Reference Application) For each project and program in the 2026 CBA:

a) Please quantify the unit cost associated with improvements in system reliability and risk profile resulting from the project and program.
b) Please quantify the value customers place on the improvements in system reliability and risk reduction and compare it to the cost of the project or program.
c) Please provide a comparison of the proposed improvements in system reliability and risk reduction compared to other projects and programs being proposed and other alternatives that are available.

CA-NP-019 (Reference Application) What is the overall improvement in productivity stemming from the projects included in the 2026 Capital Budget Application? Please identify the expected cost savings, provide an estimate of the impact on rates and provide an explanation of how these cost savings will be tracked and recorded in NP's next GRA.

CA-NP-020 (Reference Application) Please provide a summary of all laboratory testing conducted by NP in the 2026 Capital Budget Application to verify the need for asset replacement.

CA-NP-021 (Reference Application) Please identify all analyses undertaken as part of the 2026 CBA that were completed by independent third parties.

CA-NP-022 (Reference Schedule B, LED Street Lighting Replacement) For each year of the project, 2021-2026F, please provide a table that gives the following: expenditure broken down by material, internal labour and contract labour; planned number of street lights replacements; and actual number of replacements.

CA-NP-023 (Reference Schedule B, LED Street Lighting Replacement) When HPS fixtures are replaced with LED ones, is the opportunity used to address any other deficiencies with the pole or its equipment?

CA-NP-024 (Reference Schedule B, LED Street Lighting Replacement) It is stated (page 2) "*Street light fixtures will be replaced on an ongoing basis throughout the year in response to street light trouble calls.*"

a) How many street light trouble calls did NP respond to in each year for the period 2015 to 2024?

b) Does NP expect sufficient number of street light trouble calls to occur in 2026 to enable it to replace 9,400 HPS as planned? If not, will HPS fixtures be replaced in the absence of any call even if the fixture and other equipment on the pole is functioning normally?

c) Under what program does NP respond when it receives a street light trouble call when there is already a LED fixture in place but repairs are necessary?

CA-NP-025 (Reference Schedule B, Feeder Additions for Load Growth) It is stated (page 7) "*The results of the NPV analysis indicate….*" Please provide a copy of the NPV analysis.

CA-NP-026 (Reference Schedule B, Extensions) It is stated (page 11) "*Extensions to distribution lines to connect new customers are constructed upon requests from developers, contractors or individual customers.*"

a) What amount of the 2025F total expenditure of $19,982,000 was recovered via CIAC?

b) Since this work is carried out at the request of new customers, do all new customers contribute at least a portion towards the cost? Please explain the protocols in this case.

CA-NP-027 (Reference Schedule B, Reconstruction)

a) Table 1 (page 14) shows a sizeable step up in expenditures in 2023 and 2024 ($7.6 million and $8.6 million, respectively) compared to 2021 and 2022 ($6.0 million and $6.2 million, respectively). Please provide an explanation.

b) For each of the years 2021 to 2025F inclusive, please provide a table showing the decomposition of total expenditure in terms of cost categories: Material, Labour-Internal, Labour-Contract, Engineering and Other.

c) On page 14 it is stated "*The average annual adjusted cost for the Reconstruction program was approximately $7.4 million from 2021 to 2025*" and on page 15 it is stated that "*Annual expenditures are forecast to average approximately $8.1 million over the next five years.*" What is the explanation for this sizeable increase in expenditure?

CA-NP-028 (Reference Schedule B, Rebuild Distribution Lines)

a) Table 1 (page 19) shows a sizeable step up in expenditures in 2023 and 2024 ($5.1 million and $5.3 million, respectively) compared to 2021 and 2022 ($4.1 million and $4.0 million, respectively). Please provide an explanation.

b) For each of the years 2021 to 2025F inclusive, please provide a table showing the decomposition of total expenditure in terms of cost categories: Material, Labour-Internal, Labour-Contract, Engineering and Other.

CA-NP-029

(Reference Schedule B, Relocate/Replace Distribution Lines for Third Parties)

a) It is stated (page 23) "*The relocation or replacement of distribution lines results from (i) work initiated by municipal, provincial and federal governments; (ii) work initiated by telecommunications companies; and (iii) requests from customers.*" Please explain the extent to which these parties contributed to this program's costs in 2024 and 2025 and provide an estimate of their contributions to the proposed 2026 capital expenditure of $3.7 million.

b) For each of the years 2021 to 2025F inclusive, please provide a table showing the decomposition of total expenditure in terms of cost categories: Material, Labour-Internal, Labour-Contract, Engineering and Other.

CA-NP-030

(Reference Schedule B, Replacement Transformers) It is stated (page 28) "*The age profile of the Company's distribution transformers reflects its implementation of pole-mounted units with stainless steel tanks beginning in 2001. The majority of the Company's transformers have been in service for less than 20 years, with approximately 7% in service for 40 years or more.*"

a) Is the expected service life of units with stainless steel tanks longer than that of the units that have been in service for 40 years or more?

b) Of the transformers that failed from 2020 to 2024 (average of 654 annually), what portion were pole-mounted units with stainless steel tanks?

CA-NP-031

(Reference Schedule B, New Services)

a) For each of the years, 2021 to 2025F inclusive, please provide a table showing the decomposition of total expenditure in terms of cost categories: Material, Labour-Internal, Labour-Contract, Engineering and Other.

b) It is stated (page 35) "*New service wires are installed upon request from developers or contractors constructing new subdivisions, as well as individual customers who require electricity service connection.*" Please explain the extent to which the program's costs are recovered from those parties.

CA-NP-032

(Reference Schedule B, New Street Lighting)

a) It is stated (page 36) "*The New Street Lighting program involves the installation of new street lighting fixtures based on customers' service requests.*" Please explain the extent to which those who make such requests contribute to the program's cost.

b) In Table 1 (page 36), program expenditure jumps almost 50% from $1.5 million in 2021 to $2.2 million in 2022 after which expenditure remains

above $2.2 million. Please explain the large increase in 2022 over 2021 and why the higher level of spending has persisted.

c) For each of the years, 2021 to 2025F inclusive, please provide a table showing the decomposition of total expenditure in terms of cost categories: Material, Labour-Internal, Labour-Contract, Engineering and Other.

CA-NP-033

(Reference Schedule B, Replacement Street Lighting)

a) For each of the years, 2021 to 2025F inclusive, please provide a table showing the decomposition of total expenditure in terms of cost categories: Material, Labour-Internal, Labour-Contract, Engineering and Other.

b) It is stated (page 41) "*There are approximately 68,000 street lights in operation throughout the Company's service territory. Approximately 56,000 of these street lights have LED fixtures.*"

(i) How many of the 56,000 LED fixtures were put in place since 2021 through the LED Street Lighting Replacement program?

(ii) When the 56,000 LED fixtures were installed, would not NP have used the opportunity to address any failed street light poles and hardware?

(iii) With the dramatic increase in the number of poles with LED fixtures since 2021, how is using the historical average to determine 2026 expenditure justified?

(iv) Please report the number of trouble calls from customers reporting a street light outage each year from 2020 to 2024.

c) In NP's 2021 CBA, the document entitled "LED Street Lighting Replacement Plan" (page 3) stated "*...in comparison to HPS fixtures, LED fixtures require ⅓ the number of maintenance visits and each maintenance visit is less than ½ the cost.*" What evidence is there that these cost savings have been realized?

CA-NP-034

(Reference Schedule B, Greenspond Substation Refurbishment and Modernization) It is indicated (page 49) that the substation serves approximately 260 customers.

a) What is the decomposition of these customers by customer class?

b) How many customers were served by this substation following its construction in 1981?

c) Prior to 1981, how were Greenspond customers served?

CA-NP-035

(Reference Schedule B, King's Bridge Substation Power Transformer Replacement) It is stated (page 53) that "*The King's Bridge Substation Power Transformer Replacement project will mitigate risks to the delivery of reliable service...*"

a) Would the replacement of any power transformer on NP's system mitigate risks to the delivery of reliable service to customers?

b) What is the value of having spare transformers and portable substations if they will not be used during power transformer outages?

c) Given the long lead times associated with procurement of new transformers, is NP embarking on a program to replace all transformers on its system?

CA-NP-036 (Reference Schedule B, Mobile Plant Substation Power Transformer Replacement) It is stated (page 58) "*Addressing the deteriorating power transformer will support the continued supply of 10 MVA of generation from the Mobile Plant.*" Is this capacity critical to the reliability of supply to Island customers?

CA-NP-037 (Reference Schedule B, Transmission Line Maintenance)

a) It is stated (page 78) "*The program also includes components to re-treat transmission line assets with wood preservatives and to accommodate third-party requests to relocate or replace sections of transmission lines.*" Do third-parties who make such requests pay the full cost of the requested work? How is the contribution determined? What portion of the $3.3 million proposed budget is expected to be covered by CIAC?
b) In Table 1 (page 78), program expenditure in Adjusted Cost is noticeably higher in 2023 than the other years. Is there a specific reason for this and were there any CIAC that helped offset it?
c) For each of the years, 2021 to 2025F inclusive, please provide a table showing the decomposition of total expenditure in terms of cost categories: Material, Labour-Internal, Labour-Contract, Engineering and Other.
d) The proposed 2026 budget for the program is $3.306 million, which is 14.6% increase over the 2025F figure of $2.884 million. Please provide an explanation.
e) Footnote 22 of the 2026-2030 Capital Plan (page 9) indicates that approximately 82% of NP's Transmission Line Rebuild Strategy was completed by the end of 2024. With such a high proportion of the Rebuild Strategy completed, what is the anticipated impact on Transmission Line Maintenance costs?

CA-NP-038 (Reference Schedule C, New Meters and Replacement Meters, page 1 of 8) What type of meters will be installed under these programs and what is the probability of the meters becoming stranded assets?

CA-NP-039 (Reference Schedule C, Hydro Plant Replacements Due to In-Service Failures, page 4 of 8)

a) For the years 2021 to 2025F please provide annual values of expenditures on hydro plant replacements due to in-service failures.
b) Please provide a table showing the monthly generation from each of NP's hydro plants from January 2022 to June 2025, inclusive.

CA-NP-040 (Reference Schedule C, Thermal Plant Replacements Due to In-Service Failures, page 4 of 8)

a) For the years 2021 to 2025F please provide annual values of expenditures on thermal plant replacements due to in-service failures.

b) Please provide a table showing the monthly generation from each of NP's thermal plants from July 2022 to June 2025, inclusive.

CA-NP-041 (Reference Schedule C, Information Systems, page 5 of 8) What is the total cost included in the 2026 CBA for information systems and what are the expected productivity savings? How will these savings be tracked for inclusion in NP's next GRA?

CA-NP-042 (Reference Schedule C, Mount Carmel Pond Dam Fibre, page 6 of 8). It is stated "*The Spillway was commissioned in 1954, and the outlet gate currently requires manual operation by hydro plant operations staff.*"

a) How many times since 1954 has the outlet gate required manual operation?

b) What is entailed in the "manual operation" of the outlet gate?

c) Why is not this expenditure included in the Distribution Feeder CAB-01 Extension project described in Schedule B?

d) How did the dam operate without the distribution feeder and fibre optic cable?

e) How much energy and capacity does the Mount Carmel Dam provide?

CA-NP-043 (Reference Schedule D, Computation of Average Rate Base) Please extend the table (page 1 of 1) to include 2022 and 2021.

CA-NP-044 (Reference NL Hydro's 2025 CBA, 2025 Capital Budget Overview, pages 1 and 2) It is stated "*Hydro conducted a digital engagement process where it asked customers to share their thoughts on the costs and reliability of the province's electrical grid. As part of that process, four out of five customers told Hydro they believed the system was reliable and 87% said they did not want to pay more for reliability improvements that led to fewer or shorter outages. Customers largely prioritize the lowest impact on electricity rates rather than other factors, and Hydro is mindful of this concern as it continues asset management planning.*"

a) Does NP accept Hydro's customer survey as being representative of the views of NP customers?

b) Did NP engage stakeholders and customers to inform its 2026 CBA? If so, please provide all such documentation.

CA-NP-045 (Reference 2026 Capital Budget Overview) It is stated (page 2) "*Newfoundland Power's annual capital expenditures are the product of a comprehensive capital planning process.*" In P.U. 3(2025) (page 70) it is stated "*The Board notes that the evidence does not demonstrate that*

Newfoundland Power has an overall strategic plan addressing the significant issues currently facing its system and the associated costs."

a) Please explain how NP's capital planning process is comprehensive when NP does not have an overall strategic plan addressing the significant issues currently facing its system.
b) What is the status of work NP is undertaking to develop a strategic plan?
c) Please provide an organization chart of NP's planning department.
d) Is strategic planning a core component of NP's business, or will NP be approaching the Board for approval of costs to complete the strategic plan ordered in P.U. 3(2025)?
e) What are NP's core activities? Which of these activities are completed in-house, and which of these activities are assigned to outside consultants?

CA-NP-046 (Reference 2026 Capital Budget Overview) It is stated (page 5) "*The Company is currently focused on implementing an Asset Management Technology Replacement project, as approved in the 2025 Capital Budget Application.*" What is the status of this project and when can customers expect to start seeing benefits?

CA-NP-047 (Reference 2026 Capital Budget Overview) Regarding Figure 4, (page 8)

a) Did capital expenditures increase by roughly 40% from 2020 to 2024 (nominal)?
b) Please provide a revised Figure 4 that also includes nominal budget requests corresponding to each year.

CA-NP-048 (Reference 2026 Capital Budget Overview) Regarding Tables 1 and 2 (page 10) please provide similar tables but with 2017 data replaced by 2022.

CA-NP-049 (Reference 2026-2030 Capital Plan) It is stated (page 1) "*The Company's current capital plan forecasts average annual investments of approximately $172 million from 2026 to 2030.*"

a) How does this compare to average annual expenditures (nominal) over the past 5 years?
b) How is the Asset Management Technology Replacement Project expected to impact capital costs going forward? Will NP be in a better position to manage costs to mitigate rate impacts?

CA-NP-050 (Reference 2026-2030 Capital Plan) Regarding the Greenhill and Wesleyville thermal pants, it is stated (page 1) "*These units have been in service approximately 50 years and have reached the end of their useful service life.*"

a) What is the capacity of each?
b) Please provide a table showing annual energy output and days in operation for each plant for the years 1994 to 2024 inclusive.

c) If these plants were to be refurbished, would NL Hydro contribute to the cost in light of the fact (page 12) they "*are required to mitigate transmission planning contingencies associated with Hydro's Sunnyside and Stonybrook 230kV transmission loops*"?

CA-NP-051 (Reference 2026-2030 Capital Plan) It is stated (page 14) "*Newfoundland Power is currently evaluating potential impacts of EV adoption through its EV Load Management Pilot Project and the Potential Study undertaken by Posterity Group.*"

a) Please file a copy of the Posterity Group report.
b) Please provide an update of the EV Load Management Pilot Project.

CA-NP-052 (Reference 2026-2030 Capital Plan, Appendix A, Table A-1, Table A-5) Capital expenditures in 2029 are forecast to increase by more than 60% relative to 2026. Table A-5 indicates that Generation accounts for a large portion of this increase (forecast to increase to $87.3 million in 2029 compared to $2.5 million in 2026). What actions is NP taking to manage this increase to mitigate the impact on rates?

CA-NP-053 (Reference 2026-2030 Capital Plan, Appendix B, AMI Update) Table 1 indicates that AMI would cost $118 million. Assuming no offsetting savings, and taking into account costs of New Meters and Meter Replacement requirements, what would be the impact on rates and customer's average monthly bills?

CA-NP-054 (Reference 2026-2030 Capital Plan, Appendix B, AMI Update) It is stated (page 4) "*The annual costs associated with operating AMI technology is estimated to be approximately $2.0 million in 2025 dollars. This compares to the annual cost for operating AMR technology of approximately $1.4 million in 2025.*"

a) Please provide a breakdown of the annual operating costs of AMI and AMR technologies.
b) Has NP assessed AMI on the basis of costs alone, or are savings and benefits also included in its analyses?
c) Please provide a similar NPV analysis as that in 4.1 – Customer Correspondence Modernization, Appendix A for smart meters (AMI technology) relative to AMR technology. Please quantify savings associated with smart meters relative to AMR for the following:
    i) Reduced Manual Meter Reading and Meter Service Orders;
    ii) Avoided Meter Replacement Costs;
    iii) Conservation Voltage Reduction;
    iv) High Bill Alert Service;
    v) Distribution Network Losses;
    vi) Meter Accuracy Losses;

vii) Avoided Cost of Load Research Program;
viii) Avoided Cost of Net Metering Program;
ix) Avoided Cost of Meter Services Staff Salaries;
x) Avoided Cost of Meter Reading Vehicles;
xi) Outage Restoration (Crew management);
xii) Reduced Customer Inquiries;
xiii) Avoided Cost Of Handheld Systems;
xiv) Unbilled/Uncollectable Accounts; and
xv) Reduced Overtime for Meter Service Orders.

In addition, please quantify, and if not possible, qualify additional customer and societal benefits of AMI such as time-varying rates, which can provide significant benefits to customers and NP, and geographically-targeted demand-side management (DSM) programs, which can avoid or defer costly transmission & distribution ("T&D") investments.

d) On page 4 it is stated "*Newfoundland Power will continue with the use of AMR technology to fulfill its obligation to provide service to customers at least-cost and to comply with government regulations until a fulsome business case supports a full-scale AMI deployment.*" Please file NP's latest "fulsome" study quantifying the benefits of AMI technology relative to AMR technology.

CA-NP-055 (Reference 2024 Capital Expenditures Report) It is stated (page 4 of 17) "*With respect to the distribution class variance drivers, the Company has determined the 2025 budget for New Transformers and Replacement Transformers based on a 3-year average expenditure, along with an additional 11% cost increase to mitigate larger variances going forward.*" Please provide a comparison of transformer cost estimates included in NP's Capital Budgets for each of the past 5 years.

CA-NP-056 (Reference 2024 Capital Expenditure Report) It is stated (page 1 of 17) "*Newfoundland Power's actual 2024 capital expenditures were $137.4 million, resulting in a total variance of $21.6 million, or 18.6%, from the 2024 capital budget amount of $115.8 million.*"

a) What regulatory mechanism is in place to authorize NP to spend more than its approved capital budget amount?
b) Is NP required to have Board approval for the 2024 variance to be included in its rate base?
c) What feedback has NP received from the Board with respect to this expenditure variance?

CA-NP-057 (Reference 2024 Capital Expenditure Report) It is indicated (page 11 of 17) that expenditure on the LED Street Lighting Replacement project was $404,000 higher than the Capital Budget amount. What is the reason for this higher cost?

CA-NP-058 (Reference 2024 Capital Expenditure Report, Appendix A – Variance Notes) Footnote 7 (page 4 of 5) states "*Metering material costs in 2024 have increased on average 27% when compared to 2023.*" What is the cause of this increase?

CA-NP-059 (Reference 2024 Capital Expenditure Report, Appendix A – Variance Notes) It is stated (page 5 of 5) "*In 2024, contractor costs are approximately 100% higher than 2020, reflecting an average annual increase of 25%.*" Further on page 5 of 5 it is stated "*The governor was originally estimated at a cost of $225,000 in 2022. When pricing was received in 2024, the cost increased to $441,000. Similarly, the cost of switchgear equipment increased from $270,000 to $405,000 during the same period.*"

a) How are these cost increases impacting NP's capital budget forecasts and its assessments of alternatives going forward?
b) With these very high increases in costs and supply chain issues is NP reconsidering its capital budget approach, and reassessing its approach to behind-the-meter alternatives?

CA-NP-060 (Reference 2024 Capital Expenditures Report, Appendix B – Discussion of Capital Expenditures) It is stated (page 3 of 3) "*Due to not receiving these approvals, Newfoundland Power did not construct a 5km section of this line, instead tying the new line into a segment of the existing 55L transmission line.*" Replacement of this line was approved in 2022. Does this suggest that the risk of failure of transmission line 55L was overstated in NP's project justification?

CA-NP-061 (Reference 2024 Capital Expenditures Report, Appendix C – Key Performance Indicators) Table 4 indicates that only 18 of 39 (46%) planned projects were completed in 2024, and in 2023, only 19 of 37 (51%) planned projects were completed. Why is NP's performance on project execution so poor and what is being done to improve performance going forward?

CA-NP-062 (Reference 2.1 – 2026 Substation Refurbishment and Modernization, Appendix A) On pages 1 to 3 it is indicated that the 66 kV and 12.5 kV wooden pole structures were installed in 1981 and 1990, respectively. They will be replaced with galvanized steel structures. Please provide a cost comparison of wooden versus galvanized steel structures. What is the probability that the steel structures will become stranded?

CA-NP-063 (Reference 2.1 – 2026 Substation Refurbishment and Modernization, Appendix A) On page 6 it is stated "*Equipment failure in the substation exposes all customers supplied by GPD Substation to the risk of extended outages. The time to restore service to customers would depend on the nature of the failure and could range from several hours up to 36 hours.*" How many substations does NP own and operate where an equipment failure would

expose all customers supplied by the substation to the risk of extended outages?

CA-NP-064 (Reference 2.1 – 2026 Substation Refurbishment and Modernization, Appendix A) On page 6 it is stated "*The existing power transformer and voltage regulators in GPD Substation contain large amounts of insulating oil and lack standard spill containment.*" How many power transformers and voltage regulators does NP own and operate that lack standard spill containment?

CA-NP-065 (Reference 2.2 – Substation Power Transformer Strategy) On page 11 it is stated "*Of the 10 failures experienced over the last five years, three power transformers failed in service and the remaining seven were identified as being at imminent risk of failure through condition monitoring. Four of the 10 power transformers required replacement, while the remaining six were repaired and returned to service.*"

a) How does NP define a power transformer "failure"?
b) How many transformers with ages less than 50 years have been replaced in the past 10 years?

CA-NP-066 (Reference 2.2 – Substation Power Transformer Strategy) On page 15 it is stated "*Ensuring an adequate inventory of spare transformers is an important element of emergency response.*" Is this the appropriate time to be increasing the inventory of spares given the very high transformer cost increases in recent years?

CA-NP-067 (Reference 2.2 – Substation Power Transformer Strategy, Appendix E)

a) Please quantify the probability of failure of KBR-T3, MOL-T2 and MOP-T1.
b) Does the long lead time for transformer procurement rule out the Remove and Repair alternative for all transformers?
c) Does purchasing an increasing number of spares enable extended lives of transformers; e.g., run to failure?

CA-NP-068 (Reference 3.1 – Transmission Line 100L Rebuild)

a) What lessons learned from the transmission line 55L Rebuild and 94L Rebuild projects have been applied to 100L?
b) Have NP staff walked line 100L?
c) Has NP discussed required approvals with entities relevant to the approval process for Line 100L Rebuild?

CA-NP-069 (Reference 3.1 – Transmission Line 100L Rebuild) Please provide a table listing all transmission line rebuilds by NP since 2006 showing original approved budget amount and actual (or estimated) final cost for each.

CA-NP-070 (Reference 3.1 – Transmission Line 100L Rebuild)

a) For each of the outages summarized in Table 2 (page 9), how many customers were affected and for how long?

b) How many planned and unplanned outages occurred on Line 100L during 2024 and so far during 2025?

CA-NP-071 (Reference 3.1 – Transmission Line 100L Rebuild) Footnote 12 (page 9) indicates that approximately $375,000 has been spent on corrective and preventative maintenance of Line 100L since 2019.

a) With so little required expenditure since 2019 why is it necessary under Alternative 1 to spend $10.9 million (page 11) in 2026?

b) In Alternative 1, why not replace poles requiring replacement rather than building new structures next to them?

CA-NP-072 (Reference 3.1 – Transmission Line 100L Rebuild) It is stated (page 10) "*This means that any single failure on Transmission Line 109L or Transmission Line 124L could result in an outage to approximately 16,000 customers.*"

a) Is this a design criterion used by NP when planning its transmission system and does it equate to an n-2 criterion?

b) Please provide a list of NP's transmission lines that would not result in radial feeds when an outage occurs.

c) Has there ever been failures on Line 109L or Line 124L when Line 100L has been out of service? If so,when?

CA-NP-073 (Reference 3.1 - Transmission Line 100L Rebuild) It is stated (page 16) that "*A net present value ("NPV") calculation of customer revenue requirements was completed for the assessed alternatives.*" Please provide a copy of the NPV analysis.

CA-NP-074 (Reference 4.1 – Customer Correspondence Modernization) It is stated (page 1) "*The proposed solution would provide operational efficiencies and, as a result, is least-cost for customers on a net present value ("NPV") basis.*"

a) Please quantify the operational cost savings and explain how these efficiency gains will be carried forward and identified in the next GRA.

b) Would the new system reduce implementation costs and ongoing administration costs associated with smart meters (AMI technology)?

CA-NP-075 (Reference 4.1 – Customer Correspondence Modernization) It is stated (page 2) "*Newfoundland Power conducts regular Customer Satisfaction Surveys to gather customer feedback on various service interactions.*"

a) Has NP modified its customer survey to gain an understanding of customer willingness to pay for reliability improvements (balancing cost and reliability) as required in the development of the Strategic Plan directed by the Board in P.U. 3(2025), or does NP intend to use the results of Hydro's

Digital Engagement Process?

b) Are the Satisfaction Surveys designed and carried out by NP or by a consultant hired by NP with input from NP, and is there input from the Board or the Consumer Advocate?

c) Apart from surveys, how many customers per year have contacted NP over the past 10 years specifically requesting substantial changes to NP's bill design?

CA-NP-076 (Reference 4.1 – Customer Correspondence Modernization) Pages 2 and 3 identify numerous concerns with the current billing process and notes (page 2) "*Electronic users expect a more modern, interactive and digital-first experience*". How might smart meters (AMI technology) address these concerns?

CA-NP-077 (Reference 4.1 – Customer Correspondence Modernization) In footnote 5 (page 3) it is stated "*... from February 17 to March 7, 2025 approximately 5% of the 11,000 customer calls were specifically about high bills, up from 2% during the same period in 2024.*"

a) If AMI had been in place, would those customers been able to effectively monitor their consumption?

b) How many of the 550 (5% of 11,000) customers specifically requested that NP redesign its bills?

c) What were the remaining 95% of customer calls about? Did any of them request that NP redesign its bills?

d) Please confirm that NP has taken steps to address issues arising from the calls from February 17 to March 7, 2025 regarding high bills.

CA-NP-078 (Reference 4.1 – Customer Correspondence Modernization) It is stated (page 5) "*Of the utilities surveyed, 80 percent had either replaced their bill design solution in the past five years or were planning to do so within the next two to three years.*"

a) Is 80% a significant figure?

b) Is there a link to smart meters? It is understood that 89%, or 8 of the other nine Canadian provinces have, or are in the process of, installing smart meters (AMI technology).

c) How many of the utilities surveyed have either implemented AMI in the past five years or are planning to do so within the next five years?

d) Would it be more economic to modernize customer correspondence in conjunction with, and at the same time as, the introduction of smart meters?

CA-NP-079 (Reference 4.1 – Customer Correspondence Modernization, Appendix A – Net Present Value Analysis)

a) It appears from the table that the expenditure on the new software can be fully claimed against NP's taxable income in the year in which it is incurred. Please confirm or clarify.
b) In Column G the income tax figures appear to be based on a 30% corporate income tax rate representing the combined federal and provincial corporate income tax rates. Please confirm or clarify.
c) In Column H, the figures appear to be the change in NP's after-tax net income due to the project. Please confirm or clarify.
d) Why is a discount rate of 5.84% used in the analysis?
e) What would be the impact on the Present Value calculation if
   (i) a discount rate of 9.5% is used; or
   (ii) annual Net Operating Savings in 2028 to 2033 were 15% lower than anticipated in Column F?

CA-NP-080 (Reference 4.2 – Geographic Information System Upgrade) It is stated (page 2) "*Today, GIS plays a critical role in decision-making, emergency response, and resource management, offering enhanced capabilities and functionalities.*" Would smart meters (AMI technology) likewise "*play a critical role in decision-making, emergency response, and resource management, offering enhanced capabilities and functionalities*"?

CA-NP-081 (Reference 4.2 – Geographic Information System Upgrade) It is indicated that the current GIS system was implemented in 2013 (page 1), but was developed in the late 1990s (page 3). Why did NP implement a technology that was more than 13 years old?

CA-NP-082 (Reference 4.2 – Geographic Information System Upgrade) It is stated (page 7) "*GIS maintains electrical connectivity data from the substation feeder breaker to the distribution transformer to the customer's service location.*" Would smart meters (AMI technology) identify customers who are not electrically connected to the system?

CA-NP-083 (Reference 4.2 – Geographic Information System Upgrade) It is stated (page 15) "*Through various GIS and other integrating vendor engagements, cost estimates, as well as knowledge from previously completed projects, Newfoundland Power was able to develop a project cost and schedule estimate of $8,325,000.*" Does NP often use this approach to cost estimation? What is NP's confidence level in this estimate?

CA-NP-084 (Reference 5.1 – Rate Base Additions, Deductions and Allowances) What is the practice across regulated utilities in Canada regarding Cost Recovery Deferral accounts? Specifically, are they separate from rate base or always included in rate base and what interest rates apply to ones not included in rate base?

CA-NP-085 (Reference 5.1 – Rate Base Additions, Deductions and Allowances) Please provide an extended Table 1 (page 2) that includes figures from 2015 to 2024.

CA-NP-086 (Reference 5.1 – Rate Base Additions, Deductions and Allowances) Regarding the conservation costs:

a) Please provide a revised Table 4 (Page 4) that includes figures from 2009 to 2024.

b) For each year from 2010 to 2025F please provide a table that decomposes Conservation cost according to major components, differentiating according to customer class.

c) (i) Please indicate the percentage increase in domestic customer rates in 2025 and the expected increase in 2026.

(ii) Separately from conservation programs, what impact does NP expect these rate increases will have on electricity consumption?

CA-NP-087 (Reference 5.1 – Rate Base Additions, Deductions and Allowances) It is stated (page 7) "*Customer finance programs are loans provided to customers for the purchase and installation of products and services related to conservation programs and contributions in aid of construction.*"

a) Are these loans available to all customers across all customer classes?

b) What is the interest rate charged by Newfoundland Power on such loans?

CA-NP-088 (Reference Application) What is the current status of the Load Research Study and the Retail Rate Design Review?

CA-NP-089 (Reference Application) Are NP and Hydro considering policy changes to promote customer-owned generation? For example, BC Hydro has around 9,000 net metering participants. Closer to home, Nova Scotia has over 11,000 net-metered solar installations, and New Brunswick has 1,350 net metering participants. It is understood that although Hydro has a $2 billion Build Application before the Board, there are only 14 net metering projects in service across the province. Should the province consider modifying the net metering program to a simultaneous buy-sell arrangement whereby customers would be paid unmitigated rates for power supplied to the grid and would pay approved mitigated rates for power taken from the grid? Would this have a significant uptake on net metering given that Hydro is forecasting rates of the order of 25 cents/kWh in 2035 (Hydro Build Application, Schedule 3, Attachment 1, Table 5)?

CA-NP-090 (Reference Application) Given that Hydro has a $2 billion Build Application before the Board and is forecasting rates of the order of 25 cents/kWh in 2035 (Hydro Build Application, Schedule 3, Attachment 1, Table 5), should NP be advancing its load research and rate design studies?

CA-NP-091 (Reference Application) Please provide a discussion of the consideration being given to non-wires alternatives (NWAs) in each Canadian jurisdiction addressing the current practices of Canadian integrated utilities, transmission companies and major distributors. Further, please provide a discussion of the consideration being given to NWAs in each Canadian jurisdiction addressing the current practices of Canadian regulators.

CA-NP-092 (Reference CA-NP-055f pertaining to NP's 2025 CBA) It is stated "*The forecast increase in average rate base from 2024 to 2025 forecast is $47.7 million. The estimated impact on Newfoundland Power's return on equity for 2025 is $1.8 million.*" Please provide corresponding figures for 2026 through 2030 based on figures presented in the 2026 CBA.

CA-NP-093 (Reference PUB-NP-040 pertaining to NP's 2025 CBA) New Brunswick Power filed evidence with the New Brunswick Energy and Utilities Board on August 1, 2019 entitled "Advanced Metering Infrastructure Capital Project (https://www.nbpower.com/media/1489724/nbp0103.pdf) which states (page 5) "*The pace of technological change has been increasing and will continue to increase. NB Power believes that continuing to plan on the basis of making investments in traditional utility assets in the face of such change may not be prudent and reasonable.*" Further, Nova Scotia Power states on its website (https://www.nspower.ca/cleanandgreen/innovation/smart-grid-nova-scotia) "*Globally, the electrical grids that have served us over the past century are evolving through new technology into "smart grids." Smart grids offer a future in which individual pieces of the electrical system — including "smart devices" in customers' homes and businesses — can communicate with one another, so that the entire electrical system works together to use energy more efficiently. This means lower overall costs for customers and a cleaner environment.*"

a) Please file documentation produced by, or on behalf of, NP that supports or refutes these statements.
b) In the past 5 years, what has NP done to make its grid smarter so that the entire electrical system works together to use energy more efficiently?

DATED at St. John's, Newfoundland and Labrador, this 19th day of August, 2025.

Per: _____

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