

- 1 **Q. (Reference Schedule B, Replacement Street Lighting)**
2 **a) For each of the years, 2021 to 2025F inclusive, please provide a table**
3 **showing the decomposition of total expenditure in terms of cost**
4 **categories: Material, Labour-Internal, Labour-Contract, Engineering and**
5 **Other.**
6 **b) It is stated (page 41) "There are approximately 68,000 street lights in**
7 **operation throughout the Company's service territory. Approximately**
8 **56,000 of these street lights have LED fixtures." (i) How many of the**
9 **56,000 LED fixtures were put in place since 2021 through the LED Street**
10 **Lighting Replacement program? (ii) When the 56,000 LED fixtures were**
11 **installed, would not NP have used the opportunity to address any failed**
12 **street light poles and hardware? (iii) With the dramatic increase in the**
13 **number of poles with LED fixtures since 2021, how is using the historical**
14 **average to determine 2026 expenditure justified? (iv) Please report the**
15 **number of trouble calls from customers reporting a street light outage**
16 **each year from 2020 to 2024.**
17 **c) In NP' s 2021 CBA, the document entitled "LED Street Lighting**
18 **Replacement Plan" (page 3) stated "... in comparison to HPS fixtures, LED**
19 **fixtures require ½ the number of maintenance visits and each**
20 **maintenance visit is less than ½ the cost." What evidence is there that**
21 **these cost savings have been realized?**
22
23 **A. a) Table 1 provides the breakdown of total expenditure for the *Replacement Street***
24 ***Lighting* program from 2021 to 2025 forecast.**

Table 1 <i>Replacement Street Lighting Program</i> Expenditure by Cost Category (\$000s)					
Cost Category	2021	2022	2023	2024	2025F
Material	452	664	529	654	584
Labour – Internal	142	85	62	53	141
Labour – Contract	114	177	170	175	141
Engineering	17	7	8	6	9
Other	5	4	5	2	9
Total	730	937	774	890	884

- 1 b) (i) See the response to Request for Information CA-NP-022.
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3 (ii) See the response to Request for Information CA-NP-023.
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5 (iii) The *Replacement Street Lighting* program includes the expenditures associated
6 with the replacement of failed street light poles and hardware, including
7 overhead and underground wiring and pole-mounting brackets.¹ These
8 expenditures are not related to the street light luminaire or photocell and are
9 independent of the *LED Street Lighting Replacement Plan*.² Therefore,
10 expenditures associated with the *Replacement Street Lighting* program are not
11 expected to decline.

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13 Overall, the methodology used to determine the 2026 budget for the
14 *Replacement Street Lighting* program is consistent with the Company's
15 longstanding historical average approach, providing for a reasonable 2026
16 capital budget amount.

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18 (iv) See the response to Request for Information CA-NP-024.
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20 c) Newfoundland Power's operating costs are approximately \$1.8 million lower on an
21 annualized basis since the *LED Street Lighting Replacement Plan* began in 2021.
22 These savings are sustained throughout the 2024 to 2026 forecast period.³ LED
23 fixtures also require 60% less energy to provide equivalent lighting output.

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25 Cost savings related to the *LED Street Lighting Replacement Plan* are realized
26 directly by customers when an HPS fixture is replaced with an LED fixture. Current
27 customer rates for LED street lights are between 14% and 40% lower than customer
28 rates for HPS street lights.⁴ By the end of 2026, Newfoundland Power estimates that
29 Street and Area Lighting customers will have saved approximately \$6.9 million
30 through reduced charges because of the *LED Street Lighting Replacement Plan*.

¹ See Newfoundland Power's *2026 Capital Budget Application, Schedule B*, page 39.

² Capital costs recorded to the *LED Street Lighting Replacement* project involves the replacement of existing High-Pressure Sodium ("HPS") street light fixtures with Light Emitting Diode ("LED") fixtures.

³ See the response to Request for Information CA-NP-023 in relation to Newfoundland Power's *2025/2026 General Rate Application* which was approved by the Board in Order No. P.U. 23 (2025).

⁴ Based on the current customer rates approved by the Board in Order No. P.U. 23 (2025).