(Reference 2.1 - 2026 Substation Refurbishment and Modernization, 1 Q. 2 **Appendix A) On page 6 it is stated** "*The existing power transformer and* 3 voltage regulators in GPD Substation contain large amounts of insulating oil 4 and lack standard spill containment." How many power transformers and 5 voltage regulators does NP own and operate that lack standard spill 6 containment? 7 8 Newfoundland Power has 191 power transformers in service, 101 of these transformers A. 9 do not have any spill containment. There are 16 voltage regulator banks in service in 10 Newfoundland Power substations, 12 of the voltage regulator banks do not have spill

11 12 13

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18 19 containment.

Not all transformers and voltage regulators currently have spill containment because many of these assets were installed prior to the adoption of present environmental protection standards. IEEE Standard 980-2021 *Guide for Containment and Control of Oil Spills in Substations* recommends spill containment to prevent or mitigate the environmental impacts of an oil release or spill.<sup>1</sup> As substations are refurbished and transformers replaced, Newfoundland Power applies current standards and installs spill containment as part of its capital programs.

See IEEE. Standard 980-2021, Guide for Containment and Control of Oil Spills in Substations. Retrieved June 19, 2024, from <a href="https://standards.ieee.org/ieee/980/7038/">https://standards.ieee.org/ieee/980/7038/</a>. See also the response to Request for Information CA-NP-115 filed in relation to Newfoundland Power's 2025 Capital Budget Application.