(Reference 2.2 - Substation Power Transformer Strategy) On page 11 it is 1 Q. 2 stated "Of the 10 failures experienced over the last five years, three power 3 transformers failed in service and the remaining seven were identified as 4 being at imminent risk of failure through condition monitoring. Four of the 10 5 power transformers required replacement, while the remaining six were 6 repaired and returned to service." 7 a) How does NP define a power transformer "failure"? b) How many transformers with ages less than 50 years have been replaced 8 9 in the past 10 years? 10 11 A. a) Newfoundland Power defines a power transformer failure as the point at which a transformer can no longer perform its intended function safely, reliably, or in an 12 13 environmentally responsible manner within the electrical system. 14

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b) Of the 13 failures experienced over the last 10 years, six of the 13 power transformers required replacement. Five of the six power transformers that required replacement were less than 50 years old at the time of replacement.

See Newfoundland Power's 2026 Capital Budget Application, report 2.2 Substation Power Transformer Strategy, Appendix B, for the list of substation power transformer failures experienced from 2015 to 2024.

PUL-T2, one of the five power transformers less than 50 years old and requiring replacement, was transported to an external repair facility, repaired, and subsequently installed as SLA-T4's replacement in 2021.