

1 **Q. (Reference 2.2 - Substation Power Transformer Strategy, Appendix E)**
2 **a) Please quantify the probability of failure of KBR-T3, MOL-T2 and MOP- T1.**
3 **b) Does the long lead time for transformer procurement rule out the Remove**
4 **and Repair alternative for all transformers?**
5 **c) Does purchasing an increasing number of spares enable extended lives of**
6 **transformers; e.g., run to failure?**

- 7
8 **A.** a) Newfoundland Power does not currently use statistical models that permit the
9 quantification of probability of failure.¹
10
11 b) No, the long lead time for power transformer procurement does not rule out the
12 remove and repair alternative for all transformers. The feasibility of repair is
13 evaluated on a case-by-case basis considering offloading capabilities, availability of
14 spare and portable units, the cost-effectiveness of repair versus replacement,
15 transformer condition and repair scope, and customer or generation impact. Where
16 conditions and risk allow, remove-and-repair remains a viable option.
17
18 c) No, increasing the number of spare transformers does not extend transformer life or
19 justify a run-to-failure approach. Spare units do not reduce the likelihood of a
20 transformer failure or slow transformer insulation aging. Their role is to provide
21 medium-to-long-term replacement options following a transformer failure, thereby
22 relieving resource pressures on the portable substation fleet, which is intended for
23 short-term responses. A run-to-failure approach would increase exposure to large-
24 scale outages during failures and would result in higher overall costs due to the
25 reliance on more expensive emergency responses.

¹ Statistical models use distribution functions that apply data such as failure modes, condition and other factors to quantify the probability that an asset will fail. These methodologies are being reviewed by Newfoundland Power.