Q.

Reference: "2026 Capital Budget Application," Newfoundland Power Inc., June 27, 2025, Supporting Materials, Transmission: 3.1, p. 16.

The NPV analysis determined that Alternative 3, which involves rebuilding Transmission Line 100L in a partially re-routed right-of-way, is the lowest cost alternative.

a) Please reconcile the statement that Newfoundland Power's NPV analysis determined that rebuilding Transmission Line 100L in a partially re-routed right- of-way is the lowest cost alternative addressing the factors below which indicate certain costs could be avoided by addressing existing deficiencies through like- for-like replacements of the deteriorated structures, or by rebuilding in a parallel right-of-way:

 • The construction of any new 138 kV lines should be designed in accordance with CSA 60826. This standard is much more robust than CSA 22.1 or original design standards and will potentially require the construction of additional structures to meet rigorous strength requirements for the area in question. Refurbishing the existing line does not require meeting the new standard, in conjunction with good operational experience to date.

 • Should the conductor be tested and confirmed to not have reached end of life, rebuilding in place would avoid procurement and stringing of new conductor. The cost of conductor is extremely high in today's market and is considered as one of the highest costs associated with Transmission Line procurement and installation.

b) Has the conductor for Transmission Line 100L been tested to determine condition?

A.

a) As detailed in report *3.1 Transmission Line 100L Rebuild*, Newfoundland Power completed a detailed assessment of alternatives in determining the least-cost option to address the deteriorated condition of Transmission Line 100L. The assessment included three alternatives; Alternative 1 - Replace deteriorated structures and defer rebuild; Alternative 2 - Rebuild in a parallel right-of-way; and Alternative 3 - Rebuild in a partially re-routed right-of-way. A net-present value analysis of the three alternatives determined that Alternative 3 was the least cost option and, therefore, it is the approach proposed for execution by Newfoundland Power.

Table 1 on the following page outlines the results of this NPV.

Table 1 Net Present Value Analysis of Transmission L:ine 100L Rebuild Alternatives (\$000)	
Alternative	NPV
1 – Address Existing Deficiencies and Defer Rebuild	16,527
2 – Rebuild in Parallel Right-of-Way	16,032
3 – Rebuild in Partially Re-routed Right-of-Way	15,002

Alternative 2 and Alternative 3 will require Newfoundland Power to design the new transmission line to current day standards and install new conductor. As a result, the two factors identified by Newfoundland and Labrador Hydro in this Request for Information have no effect on the estimates outlines in Alternatives 2 and 3.

In executing the rejected Alternative 1, Newfoundland Power would defer the replacement of conductor for an additional five years, until 2031. In 2031, the original conductor will be 67 years old and, as such, well beyond its expected useful service life. At that time, Newfoundland Power would replace the conductor while rebuilding the structures that had been deferred from the 2026 scope of work. The cost of procuring and installing new conductor is therefore still included in the cost of Alternative 1.

Under the rejected Alternative 1, replacing the conductor on Transmission Line 100L in 2031 will subject the line to revised loading. As a result, Newfoundland Power would have to ensure that new structures built in 2026 are designed to meet current standards based on the new conductor which would be installed in 2031.

Furthermore, the current route of Transmission Line 100L traverses a large area of bog and wetlands. Completing like-for-like structure replacements would require work in this area which has poor site conditions. Construction activities in this area will increase the overall cost of the alternative. Lessons learned from recent transmission line rebuild projects have demonstrated that relocating lines away from areas of bogs and wetlands is a more cost-effective approach where possible.

b) The conductor on Transmission Line 100L has not been tested. Industry experience indicates the typical useful service life of transmission overhead conductor is 63 years. Newfoundland Power partly relies on industry experience to inform asset management decisions.