1   **Q.**   **(Reference Application, 2022 Capital Plan, page 14) Does Newfoundland Power**
2   **consider itself to be a transmission and distribution company? How does**
3   **Newfoundland Power define an asset as transmission versus distribution? Are any of**
4   **Newfoundland Power's transmission assets under the control of the system operator**
5   **(NLSO)?**
6
7   A.   Newfoundland Power considers itself to be a distribution company. The Company
8   operates transmission assets to interconnect its own substations and to accept delivery of
9   electricity from Newfoundland and Labrador Hydro ("Hydro") at select terminal stations.
10
11   Newfoundland Power defines its transmission assets as high-voltage lines that
12   interconnect its substations, or interconnect its substation with Hydro's terminal stations
13   for the delivery of electricity from the bulk transmission system. The Company's
14   transmission lines operate at 33 kV, 66 kV and 138 kV.
15
16   Newfoundland Power's distribution assets are typically shorter lines that transport
17   electricity to customers at lower voltage levels. The Company's distribution lines operate
18   at 4.16 kV, 12.5 kV and 25 kV.
19
20   No, Newfoundland Power's transmission assets are not under the control of the
21   Newfoundland and Labrador System Operator ("NLSO").[1] However, certain aspects of
22   Newfoundland Power's operations require collaboration and coordination with the
23   NLSO. For example, Hydro's Energy Control Centre ("ECC") is part of the NLSO and
24   is responsible for scheduling and dispatching energy, ensuring voltage control, regulating
25   frequency, and maintaining reserves. Newfoundland Power's System Control Centre is
26   in constant communication with the ECC for the day-to-day coordination required for the
27   systems of both utilities to operate reliably.

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[1]   The NLSO's resource list identifying the transmission assets under its control can be found at the following link
http://www.oasis.oati.com/woa/docs/NLSO/NLSOdocs/Network_Resource_List_10202020.pdf.