

- 1 **Q. a) Please confirm that the Memorial University of Newfoundland (“MUN”)**
- 2 **St. John’s campus is considered a single customer by Newfoundland**
- 3 **Power Inc. (“Newfoundland Power”) and the facilities on the MUN St.**
- 4 **John’s campus are served by electrical system assets owned by MUN.**
- 5 **b) Does Newfoundland Power consider redundant supply a special facility**
- 6 **under Clause 9(c) of Newfoundland Power’s Schedule of Rates, Rules, and**
- 7 **Regulations?**
- 8 **c) Does Newfoundland Power normally charge a contribution when**
- 9 **investment in assets are required to provide redundant supply to a**
- 10 **customer? If yes, please explain the circumstances when contributions for**
- 11 **redundant supply are required. If no, why not?**

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- 13 **A. a) It is confirmed.**
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- 15 **b) Yes, Newfoundland Power considers redundant supply to be a special facility**
- 16 **pursuant to Clause 9(c) of its *Schedule of Rates, Rules and Regulations*.**

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18 In 2019, Newfoundland Power filed an application for supplemental capital
19 expenditures to construct Long Pond (“LPD”) Substation. The proposed
20 expenditures were approved by the Board in Order No. P.U. 5 (2019).

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22 The application to construct LPD Substation was filed following a request by
23 Memorial University to establish a substation on the north side of its St. John’s
24 campus. Memorial University requested the construction of a second substation to:

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- 26 (i) Improve reliability and provide an increased level of redundancy of utility
- 27 supply to the Health Sciences Centre and the rest of the campus; and
- 28 (ii) Increase flexibility on Memorial University’s existing 12.47 kV distribution
- 29 system to accommodate forecast load growth and future maintenance
- 30 activities.¹

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32 The construction of a new substation was determined to be a request for a special
33 facility. The circumstance that led to that determination was the fact that there was
34 already adequate capacity available at MUN Substation at that time.
35 Memorial University, through the provincial Department of Transportation and
36 Works, paid a contribution in aid of construction of approximately \$4.0 million
37 towards the construction of LPD Substation and the associated transmission
38 infrastructure to achieve the desired redundancy.²

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- 40 **c) Yes, Newfoundland Power normally requires a contribution from customers towards**
- 41 **the construction of special facilities, including facilities requested by customers to**
- 42 **provide sources of redundant supply. See part b) of this response.**

¹ See the *Application, Schedule C*, page 1 for approval of supplemental capital expenditures for the construction of LPD Substation, filed January 30, 2019.
² Memorial University’s contribution towards LPD Substation also included an allowance for sustaining operating and maintenance costs.