IN THE MATTER OF the **Electrical Power Control Act**, 1994, SNL 1994, Chapter E-5.1 (the "**EPCA**") and the **Public Utilities Act**, RSNL 1990, Chapter P-47 (the "**Act**"), as amended, and regulations thereunder; and

IN THE MATTER OF an application by Newfoundland and Labrador Hydro for an order approving capital expenditures related to the construction of the Bay d'Espoir Hydroelectric Generating Facility Unit 8 and the Avalon Combustion Turbine, pursuant to section 41(3) of the **Act**.

PUBLIC UTILITIES BOARD
REQUESTS FOR INFORMATION

PUB-NLH-001 to PUB-NLH-017
REDACTED
Issued: January 13, 2026

PUB-NLH-001 Schedule 1, page 4, lines 23 to 26.

"The concerns regarding delays in the project schedule as a result of having to pause work pending approval, and the associated risks of increased costs remain. Pausing this work to await approval of the 2025 Build Application would have significant implications for the proposed projects' schedules and costs."

a) If the Application for Additional Early Execution Capital Work is not approved, what work items will be paused.
b) What are the specific concerns associated with having to pause work pending approval? In the response focus on the specific concerns and costs associated with (i) continuing into 2026 with only the existing scope and budget approved in Board Order No. P.U. 17(2025); and (ii) waiting until after the Board Order on the 2025 Build Application is released before proceeding with the additional scope of work.

PUB-NLH-002 Section 2.3, Status of Early Execution Work, provides information on how much of the original scope of work has been completed. Many items reference work ongoing and to be completed in December 2025. For each of the items listed below, provide the status as of December 31, 2025.

a) CT Package
b) Transformers
c) Early Execution Civil Works
d) Transmission Line Relocation
e) Geotechnical Investigation

PUB-NLH-003 Complete the table below for the Avalon CT providing a comparison of the scopes of work in the original and additional work applications. Add additional rows to the table as required.

Original Early Execution Scope of Work	Original Early Execution Scope Completed December 31, 2025	Remaining Original Early Execution Scope for2026	Proposed Additional Scope of Work
Critical Path Request for Proposal ("RFP") preparation, issuance and award for CT and GSU transformers. This entails the detailed engineering and fabrication scheduling necessary to complete the work and includes firm confirmation of the final supply and install pricing and schedule.			
Engage Engineering Support from an EPCM Contractor to support the following activities: • Complete geotechnical investigations and surveys needed to support the execution phase; and • Detailed execution planning activities, such as establishing project execution plan, contracting plan, and other planning documentation			
Preparation of Early Execution RFP and engage with Early Execution contractors to complete initial geotechnical work and minor excavations in preparation to support line relocation and new line installations to ensure the overall schedule can be maintained.			
Avalon CT interface optimization assessments in areas such as fire water supply, overall site fuel utilization, etc.			

PUB-NLH-004 Complete the table below for Bay d'Espoir Unit 8 providing a comparison of the scopes of work in the original and additional work applications. Add additional rows to the table as required.

Original Early Execution Scope of Work	Original Early Execution Scope Completed December 31, 2025	Remaining Original Early Execution Scope for2026	Proposed Additional Scope of Work
Engage EPCM contractor to support the following activities: • Complete geotechnical investigations and surveys that are needed to support execution phase. Engineering and specifications for long lead or early equipment, such as Turbine and Generator Package, GSU transformer, draft tube stop logs, and 230 kV breakers. • Detailed execution planning activities, such as establishing project execution plan, contracting plan, and other planning documentation.			
Engage Turbine Generator original equipment manufacturers ("OEM") to complete Computational Fluid Dynamics modeling and model testing. The work would also include confirmation of the final supply and install pricing and schedule.			
Complete Environmental Assessment Registration and continue with stakeholder engagement process.			

PUB-NLH-005 Please complete the table below providing the approved budget, forecast expenditures to December 31, 2025 and requested additional amount for the Avalon CT.

Category	Category	Approved Budget P.U. 18 (2025) ($000)	Forecast Expenditure to December 31, 2025 ($000)	Requested Additional Expenditure for 2026 ($000)
EPCM Support and Internal Project Management	Non-Labour			
	Internal Labour			
	External Labour			
CT Procurement	Non-Labour			
	Internal Labour			
	External Labour			
Early Site Works and Geotechnical Study	Non-Labour			
	Internal Labour			
	External Labour			
GSU Transformer Procurement	Non-Labour			
	Internal Labour			
	External Labour			
Environmental Assessment Registration and Studies	Non-Labour			
	Internal Labour			
	External Labour			
Contingency				
Interest During Construction ("IDC") and Escalation				
Total		30,710		

Notes: External labour is the amount budgeted and paid for contractors and consultant costs.

PUB-NLH-006 Please complete the table below providing the approved budget, forecast expenditures to December 31, 2025 and requested additional amount for Bay d'Espoir Unit 8.

Category	Category	Approved Budget P.U. 18 (2025) ($000)	Forecast Expenditure t to December 31, 2025 ($000)	Requested Additional Expenditure for 2026 ($000)
EPCM Support and Internal Project Management	Non-Labour			
	Internal Labour			
	External Labour			
Turbine Generator Procurement	Non-Labour			
	Internal Labour			
	External Labour			
Environmental Assessment Registration and Studies	Non-Labour			
	Internal Labour			
	External Labour			
Utilities Reroute	Non-Labour			
	Internal Labour			
	External Labour			
GSU Transformer Procurement	Non-Labour			
	Internal Labour			
	External Labour			
Curcuit Breaker Procurement	Non-Labour			
	Internal Labour			
	External Labour			
Contingency				
Interest During Construction ("IDC") and Escalation				
Total		16,6700		

Note: External labour is the amount budgeted and paid for contractors and consultant costs.

PUB-NLH-007 Schedule 1, page 12, lines 15 to 17.

"The proposed approach to be utilized for the procurement of the CT and GSU transformers is forecasted to limit Hydro's cost exposure for those particular items to approximately [redacted] of which represents the contract cancellation clauses for CTs and transformers)."

a) Describe the composition of the [redacted] amount for the Avalon CT.
b) Describe in detail what has happened since the early execution application was approved in Order No. P.U.17 (2005) to increase Hydro's cost exposure by [redacted] ([redacted]) for the Avalon CT.

PUB-NLH-008 Schedule 1, page 19, line 22.

a) Describe in detail what has happened since the early execution application was approved in Order No. P.U.17 (2005) to increase Hydro's cost exposure by [redacted] million ([redacted]) for Bay d'Espoir Unit 8.
b) Explain how Hydro intends to manage this increased cost exposure.

PUB-NLH-009 Schedule 1, page 10. Detail the proposed work to be completed by Hydro as part of managing oversight for the fabrication of the CT and GSU transformers including the costs associated with each specific work item categorizing costs as non-labour, internal labour and external labour.

PUB-NLH-010 Schedule 1, page 11, Table 1. Please provide details of the scope of work required for each expenditure listed in Table 1. Include in the response why each scope of work is required to be completed at this time and when Hydro expects each of the expenditures to be made.

PUB-NLH-011 Schedule 1, page 11, Table 1. For the CT Procurement item, the description states:

"Manage oversight and fabrication of CT package, payment terms for equipment, **inclusion of cancellation clauses** in contract."

Footnotes 14 and 15 refer to project termination costs and cancelation clause payments. Confirm that the originally approved [redacted] and the proposed [redacted] in additional capital expenditures requested for approval by the Board do not include any project termination cost or cancelation clause payments. Further in the response explain how the footnotes apply to the amounts provided for this item.

PUB-NLH-012 Schedule 1, page 11, Table 1. Please confirm that the Cancellation Clause Costs amount of [redacted] for Avalon CT Procurement is coincidentally the same amount as the Total Early Execution Capital Budget amount which is the sum of the Approved Budget Amount and the Additional Early Execution amount (Columns A+B) if not an error.

PUB-NLH-013 Schedule 1, page 11, Table 1. Please add another column to the right of Table 1 that sums the entire amount at risk for each line item. The amount at risk is the sum of columns A, B and C.

PUB-NLH-014 Schedule 1, page 18, Table 2. Please provide details of the scope of work required for each expenditure listed in Table 2. Include in the response why each scope of work is required to be completed at this time and when Hydro expects each of the expenditures to be made.

PUB-NLH-015 Schedule 1, page 18, Table 2.

a) Explain the cancellation clause amount of [redacted] associated with the EA Registration and Studies.
b) Explain the cancellation clause amount of [redacted] associated with GSU Transformer Procurement, addressing why a cancelation clause cost is provided when the procurement process won't commence until 2026.
c) Explain why there is no additional early execution budget amount for the Circuit Breakers Procurement line item.
d) Explain the cancellation clause amount of [redacted] associated with Circuit Breakers Procurement, addressing why a cancelation clause cost is provided when the procurement process won't commence until 2026.

PUB-NLH-016 Schedule 1, page 18, Table 2. Please add another column to the right of Table 2 that sums the entire amount at risk for each line item. The amount at risk is the sum of columns A, B and C.

PUB-NLH-017 In the correspondence dated December 12, 2025 Hydro states:

"…including the procurement of long-lead critical equipment required for project advancement, will take years."

What long-lead critical equipment will be procured as part of the work proposed in the Additional Early Execution Capital Works Application that is additional to the critical equipment procured as part of the work included in the Original Early Execution Capital Works Application?

DATED at St. John's, Newfoundland and Labrador this 13th day of January 2026.

BOARD OF COMMISSIONERS OF PUBLIC UTILITIES

Per

Colleen Jones

Colleen Jones
Assistant Board Secretary