

1 **Q. Reference: 2025 Capital Budget Application, Program 2, Upgrade Worst-Performing**
2 **Distribution Feeders (2025-2027), page 1, lines 13 to 14.**

3 Hydro indicates that it has combined the scope of this program with the Renew Distribution
4 Feeders program. Please explain how upgrades to worst-performing distribution feeders
5 conforms with the definition of program as established in the Provisional Guidelines.

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8 A. The Upgrade Worst-Performing Distribution Feeders Program is classified as a Service
9 Enhancement Program, aimed at improving the reliability of poor-performing feeders. The
10 2025–2027 program includes the refurbishment of the English Harbour West Line 1 (“EHW-L1”)
11 feeder, which was prioritized through the examination of reliability performance data and
12 confirmed as requiring upgrades to the existing infrastructure based on recent condition
13 assessments. The EHW-L1 feeder was also selected for refurbishment under the Renew
14 Distribution Feeders Program following annual inspections.

15 Newfoundland and Labrador Hydro (“Hydro”) categorizes upgrades to its worst-performing
16 distribution feeders as a program, as they are high volume and are repetitive with regards to the
17 scope, justification, and frequency of execution. The components identified for like-for-like
18 replacement or refurbishment are anticipated to continue operation in a reliable condition for
19 the foreseeable future. The combining of these scopes was the result of the EHW-L1 feeder
20 being identified for both programs; rather than select a different feeder for renewal under the
21 Renew Distribution Feeders Program, Hydro decided to pause the Renew Distribution Feeders
22 Program for one year and address EHW-L1 in the Worst-Performing Feeder Program. Hydro
23 believes that the scope of work identified for renewal of EHW-L1 constitutes a component of the
24 Upgrade Worst-Performing Distribution Feeders Program.¹ Combining both scopes of work into
25 a single project under the 2025-2027 Upgrade Worst-Performing Distribution Feeders Program
26 provides administrative, regulatory, and execution efficiency.

¹ The Renew Distribution Feeders and Upgrade Worst-Performing Distribution Feeders Program scopes for the EHW-L1 feeder in 2025 both include a focus on replacing deteriorated poles and crossarms.