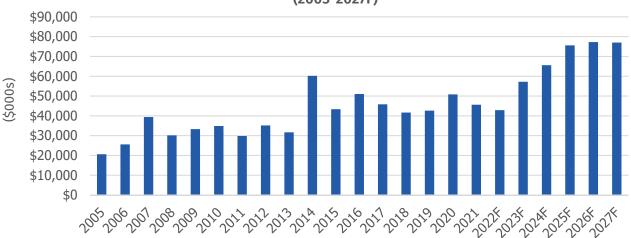
Q.

- (Reference NLH-NP-009(c), CA-NP-089 and CA-NP-093) It is stated (NLH-NP-009(c)) "Newfoundland Power estimates that its annual capital expenditures over the next five years would be reduced by approximately \$26 million annually if the replacement and refurbishment of electrical system assets remained consistent with historical investment levels."
 - a) Will expenditures for the renewal classification increase by roughly \$34 million (79%), from \$43 million in 2022 to \$77 million in 2025 (Section 3.2 of Capital Plan)?
 - b) Please reproduce the graph in CA-NP-093 showing the renewal category only.
 - c) What is the justification for this cost increase?
 - d) Is the identification of aging equipment a relatively new experience? When did Newfoundland Power first determine that its assets are aging?
 - e) What role will the asset management review play in the determination of costs in the renewal classification going forward?
 - f) Has Newfoundland Power undertaken any actions to offset these expenditures and maintain current levels of capital spending?
 - g) Will the asset management review proposed by Newfoundland Power be a similar exercise to that performed by Liberty in 2014?
 - h) Will customers be consulted and take part in the asset management review?
 - i) What is the expected cost of the asset management review and in what year is it expected to inform costs in the renewal classification?
- A. a) Newfoundland Power's 2023-2027 Capital Plan forecasts that expenditures for the Renewal classification will increase from approximately \$43 million in 2022 to approximately \$76 million in 2025. This represents an increase of approximately \$33 million.
 - b) Figure 1 shows forecast capital expenditures for the Renewal classification only.





c) Newfoundland Power's planned refurbishment and replacement of electrical system assets is explained in *Section 2.4 Asset Condition Outlook* of its *2023-2027 Capital Plan*.

As described in that section, a significant portion of Newfoundland Power's electrical system assets were constructed in the 1960s and 1970s following provincial electrification efforts in rural areas. A high quantity of assets that have been in service for between 50 and 60 years are aging beyond their expected useful service lives, resulting in a forecast increase in requirements to refurbish and replace electrical system assets going forward.

Increases in Renewal investments in the distribution asset class include the continuation of longstanding corrective and preventative maintenance programs, as well as an increase in distribution feeder refurbishment projects. Renewal investments in the transmission and substation asset classes reflect increases in the amount of work to be completed under the *Transmission Line Rebuild Strategy* and *Substation Refurbishment and Modernization Plan* over the forecast period. Renewal investments in the generation asset class reflect both an increase in refurbishment projects for hydro plants and the planned replacement of the Wesleyville and Greenhill gas turbines with a new mobile unit. For additional information, see *Section 3.3 Planned Expenditures by Asset Class* of the Company's *2023-2027 Capital Plan*.

d) No, the identification of aging equipment is not a new experience. For example, the age of Newfoundland Power's transmission lines was identified as a primary driver of the Company's *Transmission Line Rebuild Strategy* filed as part of the 2006 Capital Budget Application. The *Transmission Line Rebuild Strategy* outlined a plan to rebuild its oldest and most deteriorated transmission lines.¹

Newfoundland Power's annual capital budget applications include the capital expenditures necessary to provide safe and reliable service to customers at the lowest possible cost. This includes expenditures associated with the replacement and refurbishment of existing assets. These expenditures are necessary to replace electrical system assets that are deteriorated, deficient or fail in service, or to refurbish assets to extend their useful service lives.

The proportion of expenditures associated with the replacement and refurbishment of existing assets reflects the age and condition of the Company's electrical system. Forecast increases in expenditures to replace and refurbish existing assets reflect the fact that a larger proportion of assets are expected to reach the end of their expected useful service lives in the coming years, as described in part c).

e) Newfoundland Power is currently developing a framework to guide its asset management review. The Company's asset management strategies and capital investments in the Renewal classification will be included as part of that review.

¹ See the 2006 Capital Budget Application, report 3.1 Transmission Line Rebuild Strategy.

f) Newfoundland Power's investment priorities and its five-year capital plan reflect increasing capital expenditures that are expected to be necessary to meet its statutory obligations under the *Public Utilities Act* and *Electrical Power Control Act, 1994*.

The Company manages its annual capital expenditures through a comprehensive capital planning process. The process commences each year with an update of the Company's five-year capital plan for the latest forecasts of customer and system load growth, anticipated operational requirements and electrical system condition. The annual update of Newfoundland Power's capital plan to reflect this information can result in planned expenditures being modified, advanced to an earlier year, deferred to future years, or removed entirely from the planning period.² All planned capital expenditures will be subjected to further review prior to being proposed for Board approval.

g) The review conducted by Liberty in 2014 resulted from a Board investigation into supply outages that resulted in widespread customer outages. Liberty's review included consideration of Newfoundland Power's asset management practices, as well as other issues such as its operational response to customer outages.

Newfoundland Power's asset management review will include topics similar to those addressed by Liberty in 2014. However, the Company notes that its review is not the result of a service quality issue comparable to that experienced in 2014. Rather, the review is designed to ensure Newfoundland Power's asset management practices remain adequate in light of its aging assets and evolving industry trends.

- h) Newfoundland Power is currently developing a framework to guide its asset management review. As the framework has not been developed, the Company cannot confirm whether it will include consultations with customers.
- i) Newfoundland Power has not yet developed the framework to guide its asset management review and is therefore unable to provide information on costs associated with the review or in what year the results may inform costs in the Renewal classification.

The Company notes that its asset management review is a long-term initiative. The framework for conducting the review will be completed in 2022 and the results of the review are expected to be available in 2024. The timelines associated with implementing any resulting recommendations will depend on the recommendations identified and may require a phased approach over several years.

See the *2023 Capital Budget Application, 2023 Capital Budget Overview, Section 2.2 Capital Planning at Newfoundland Power.*