

- 1 **Q. (Reference Application, 2.2 Substation Power Transformer Replacements,**
2 **Appendix A, page 6) It is stated "Run to failure is not a viable alternative as it**
3 **would increase risks to the delivery of safe and reliable service to 6,724**
4 **customers in the communities of Torbay, Portugal Cove–St. Philip’s, Pouch**
5 **Cove and Logy Bay–Middle Cove–Outer Cove. Deferral of the Pulpit Rock**
6 **Substation Power Transformer Replacement multi-year project would**
7 **increase the risk that PUL-T2 will fail in service." By how much would the risk**
8 **be increased? Has the risk of failure not been increasing every day for the**
9 **past 10 years?**
- 10
- 11 **A.** Running a power transformer to failure significantly increases the risk of catastrophic
12 failure which can result in unplanned outages and additional costs. The risk of failure
13 does not increase linearly but can increase rapidly as the transformer approaches the
14 end of its useful life. The Transformer Condition Assessments completed on PUL-T2
15 have consistently indicated arcing and heating at high temperatures inside the
16 transformer since May 2022. These are signs of the deteriorating health of the power
17 transformer, and therefore increased risk of failure. In the 10-year period prior to May
18 2022, the annual Transformer Condition Assessments did not show any indication of
19 arcing or heating at high temperatures inside the transformer.