



Newfoundland and Labrador Hydro
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November 14, 2024

Board of Commissioners of Public Utilities
Prince Charles Building
120 Torbay Road, P.O. Box 21040
St. John's, NL A1A 5B2

Attention: Jo-Anne Galarneau
Executive Director and Board Secretary

Re: Newfoundland Power Inc.'s 2025 Capital Budget Application – Newfoundland and Labrador Hydro's Submission

On June 28, 2024, Newfoundland Power Inc. ("Newfoundland Power") filed its 2025 Capital Budget Application ("CBA") with the Board of Commissioners of Public Utilities ("Board"). Newfoundland and Labrador Hydro ("Hydro") filed its Notice of Intention to Participate on July 23, 2024, and subsequently issued Requests for Information ("RFIs") for additional detail on certain aspects of the CBA.

Hydro has reviewed Newfoundland Power's CBA and the responses to the RFIs filed by the intervenors and does not object to any of the proposed capital expenditures. However, Hydro believes that, for high value assets such as power transformers, Newfoundland Power should consider fulsome assessment of the technical viability of repair versus replacement, and economic assessment of repair alternatives. Hydro believes that careful management of Newfoundland Power's spare transformer and portable substation fleet could facilitate repair options while providing a more favorable balance of reliability risk and cost.

Should you have any questions, please contact the undersigned.

Yours truly,

NEWFOUNDLAND AND LABRADOR HYDRO

Shirley A. Walsh
Senior Legal Counsel, Regulatory
SAW/rr

ecc:

Board of Commissioners of Public Utilities
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