

Office of the Consumer Advocate

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August 3, 2026

Via Email

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

Attention: Mike McNiven (Board Secretary)

Re: Newfoundland Power Inc.'s ("Newfoundland Power") 2027 Capital Budget Application ("CBA") – Consumer Advocate Request for Technical Conference

Pursuant to the 2027 CBA schedule, the Consumer Advocate requests a technical conference on the following list of issues/questions:

1. Power and Distribution Transformer Replacements: Whether condition evidence supports replacing transformers that experienced no major failures between 2015 and 2025.
2. Portable Substation: Whether the proposed portable substation is needed, having regard to historical utilization of the existing fleet, the extent to which the approved spare transformer inventory addresses the deployment durations relied upon, and the unit's unavailability for deployment until 2030.
3. Customer Connection Forecast: Questions about the methodology, inputs, and accuracy of the connection forecast.
4. Risk Quantification and Record-Keeping: Whether Newfoundland Power's asset and cost records permit any assessment of risk reduction or reliability gained per dollar of proposed expenditure, in the absence of risk-scoring and failure data in analyzable form, and only aggregate cost records.
5. Budget Performance and Estimate Accuracy: Newfoundland Power's record against approved capital budgets, the accuracy of the estimates, recent cost overruns, and measures to improve estimate reliability prospectively.
6. Replacement Street Lighting Program: Whether determining this program by reference to a

historical five-year average remains appropriate, and consideration of the impact of the LED Street Lighting Replacement project.

7. Lookout Brook Bridge Replacement and LBK-T1 Power Transformer Replacement: Questions about the detailed assumptions and methods used to calculate the plant's levelized value per kWh and the cost of replacement production per kWh.
8. Newfoundland Power's Hydroelectric Plants: Whether the planned closure of the Holyrood TGS and greater reliance on Muskrat Falls alter the role, use and need for certain NP plants, and whether a fleet-level assessment should precede further significant plant-specific capital.

Should you have any questions, please contact the undersigned.

Yours truly,

CONSUMER ADVOCATE



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