

1 **Q. (Reference Schedule B, Replacement Street Lighting program)**

2
3 **This program (page 64) "involves the replacement of failed street lighting**
4 **components..." Page 66 notes that the LED Street Lighting Replacement**
5 **project will be completed in 2026. In NP's 2021 CBA, the document entitled**
6 **"LED Street Lighting Replacement Plan" (page 3) states "... in comparison to**
7 **HPS fixtures, LED fixtures require ½ the number of maintenance visits and**
8 **each maintenance visit is less than ½ the cost." And in response to CA-NP-023**
9 **(NP CBA 2026), it was stated "opportunities to address other deficiencies are**
10 **evaluated during the replacement of an HPS street light fixture with an LED**
11 **street light fixture. If feasible, the responding crew will make the repairs**
12 **during the same site visit as the street light replacement."**

- 13
14 **a) With the completion of the LED Street Lighting Program in 2026, why**
15 **has the 2027 cost of the Replacement Street Lighting program not**
16 **declined?**
17 **b) At half the number of maintenance visits with each visit being half the**
18 **cost, why are costs not reduced by 75%?**
19 **c) Please provide a table showing the number of street light replacements**
20 **for the first six months of 2025 and for the first six months of 2026.**

- 21
22 **A. a)** The scope of the current *Replacement Street Lighting* program was established in
23 2021, and involves the correction of deficiencies other than those pertaining to
24 the street light fixture. This includes replacement of pole brackets, overhead and
25 underground wiring, dedicated street lighting poles that have failed in service, or
26 any other repair not involving a street light fixture.

27
28 While the *LED Street Lighting Replacement* project is ongoing, the only street
29 lights replaced under the *Replacement Street Lighting* program would be LED
30 luminaries that failed in service. These failures include mechanical damage such
31 as a motor vehicle accident cracking off a pole, vandalism, or manufacturing
32 defect.¹ With the completion of the *LED Street Lighting Replacement* project in
33 2026, the *Replacement Street Lighting* program will become the primary capital
34 program to address in-service failures of street light fixtures, including the
35 existing scope of the program as described above, with the addition of street light
36 luminaries.² For this reason, the Company has not decreased its forecast of the
37 *Replacement Street Lighting* program. Newfoundland Power will continue to
38 monitor actual expenditures under this program to determine if adjustments may
39 be needed as it gains operational experience in addressing in-service failures of
40 street lighting components.

¹ In the event a street light luminary fails within 10 years of its date of manufacture, it is returned to the manufacturer for a replacement in accordance with the manufacturer's warranty terms. Costs associated with removing a defective LED luminary and replacing it would be charged to the *Replacement Street Lighting* program.

² See the *2027 Capital Budget Application*, Schedule B, page 66.

- 1 b) The quoted reference of LED street lights requiring half the number of
2 maintenance visits and each maintenance visit costing less than half the cost
3 pertains to the street light luminary and does not include associated street
4 lighting hardware such as poles, brackets and wiring. See part a).
5
6 c) The replacement of HPS street light luminaries with LED luminaries in 2025 and
7 2026 were completed under the *LED Street Lighting Replacement* project and not
8 the *Replacement Street Lighting* program. Newfoundland Power is unable to
9 provide actual street light replacements for the month of June 2026 as the figure
10 is not yet available. Table 1 provides the street light fixtures replaced in the first
11 five months of 2025 and 2026 (January to May inclusive) for reasonable
12 comparison.

Table 1 Street Light Fixture Replacements January - May	
Year	Quantity Replaced
2025	6,499
2026	5,593