

1 **Q. (Reference NLH-NP-006 Table 1) According to Table 1, 84% of the outages**
2 **on the 12-kilometre section of GLV-02 are due to "danger tree" contacts, with**
3 **48% being the corresponding figure for the 5-kilometre section. Would it not**
4 **be more cost-effective to reduce tree growth/increase vegetation**
5 **management at strategic points along the current routes? Has this option**
6 **been canvassed with Parks Canada?**

7
8 **A.** No, increased vegetation management along the existing offroad corridor would not be
9 a more cost-effective alternative than rebuilding and relocating the deteriorated
10 12-kilometre section of distribution feeder GLV-02 to a roadside corridor.

11
12 As discussed in the *2027 Capital Budget Application*, report *1.1 Distribution Reliability*
13 *Initiative*, the two viable alternatives that were considered were: (i) rebuilding the
14 section of distribution line in a new roadside corridor, and (ii) rebuilding the section of
15 distribution line in its existing off-road corridor. The requirement to rebuild the section of
16 line is a result of its deteriorated condition, as determined by detailed engineering
17 inspections.¹ Accordingly, increased vegetation management would not remove the
18 underlying requirement to rebuild the section of line.

19
20 While the response to Request for Information NLH-NP-006 shows that a majority of the
21 outages on the 12-kilometre section are related to danger tree contacts, Newfoundland
22 Power also stated that this is reflective of restrictive vegetation management capabilities
23 within the boundary of Terra Nova National Park and further illustrates the need to
24 rebuild and relocate the line section to a roadside corridor. This is also demonstrated by
25 the most recent outage incident that occurred on August 14, which resulted in all
26 customers in the Town of Charlottetown being without power for 26 hours, as described
27 in the response to Request for Information CA-NP-065. Specifically, patrolling the
28 section and bringing equipment to the site to complete repairs are negatively impacted
29 by the remote nature and relative inaccessibility of the line. As a result, if additional
30 tree-trimming and right-of-way widening were possible within the Terra Nova Park
31 Boundary, Newfoundland Power would still be left with a deteriorated offroad line that is
32 more difficult and costly to inspect, patrol, maintain and restore than a line rebuilt in a
33 roadside corridor.

34
35 Newfoundland Power works with Parks Canada to coordinate work within the Terra Nova
36 National Park boundary and has a restricted activity permit for operations within the
37 park boundaries. Newfoundland Power has discussed this project proposal with Parks
38 Canada and understands that an environmental assessment and environmental project
39 plan will be required. Newfoundland Power has not identified a vegetation-management-
40 only approach on the existing offroad corridor as a viable alternative, as it would not

¹ Detailed engineering inspections identified deteriorated conductor, poles, crossarms and insulators on the affected GLV-02 sections, together with line inaccessibility, as contributing to poor reliability. On the 12-kilometre section specifically, the conductor is exhibiting advanced deterioration and separation of strands and cannot be safely repaired using hotline work methods. Approximately 40 poles along the specified sections were also identified as requiring replacement due to significant deterioration, including shell separation, cracking, woodpecker damage and structural deformation.

- 1 address the deteriorated condition of the line or the significant access, patrol and
- 2 restoration challenges associated with the current offroad route. The assessment of
- 3 viable alternatives determined that relocation of the line to a roadside corridor is least-
- 4 cost.