

1 **Q.** (Reference CA-NP-039) According to Schedule B (page 64) of the Application,
2 the Replacement Street Lighting program involves the replacement of failed
3 street lighting components including "fixtures." It is stated in response to CA-
4 NP-039 that the Replacement Street Lighting program "...involves the
5 correction of deficiencies other than those pertaining to the street light
6 fixture."

7 a) Please clarify whether that program includes replacement of failed
8 fixtures.

9 b) Additionally, CA-NP-039 quoted a previous response by Newfoundland
10 Power (NP 2026 CBA) in regard to the LED Street Lighting
11 Replacement Project that "*opportunities to address other deficiencies*
12 *are evaluated during the replacement of an HPS street light fixture*
13 *with an LED street light fixture. If feasible, the responding crew will*
14 *make the repairs during the same site visit as the street light*
15 *replacement."* Please clarify the extent of any overlap in "other
16 deficiencies" in this quote and "deficiencies other than those pertaining
17 to the street light fixture" in the previous quote.

18 c) Please explain whether the repairs to address "other deficiencies"
19 made under the LED Street Lighting Replacement project have resulted
20 in any cost savings for the Replacement Street Lighting program.
21

22 **A.** a) Prior to Newfoundland Power's 2022 Capital Budget Application, installation of
23 new street lights for customers and replacement of street light equipment which
24 had failed in service was completed under a single capital *Street Lighting* project.
25 Beginning in Newfoundland Power's 2023 Capital Budget Application, the *Street*
26 *Lighting* project was split into the *New Street Lighting* and *Replacement Street*
27 *Lighting* programs to bring the projects into compliance with changes introduced
28 in the Provisional Guidelines.¹
29

30 The identified quotation from the response to Request for Information
31 CA-NP-039 refers to "the scope of the current *Replacement Street Lighting*
32 program" meaning the program as approved in the 2026 Capital Budget
33 Application and prior capital budgets.
34

35 The *LED Street Lighting Replacement* project was first proposed in
36 Newfoundland Power's 2021 Capital Budget Application. While this project was
37 ongoing, all defective legacy street lighting luminaries were replaced with LED
38 street light luminaries.
39

40 The statement on page 64 of Schedule B refers to the *Replacement Street*
41 *Lighting* program proposed in the 2027 Capital Budget Application which has an

¹ These changes included the organization of expenditures into projects or programs instead of clustered, pooled or other, along with the introduction of investment classifications instead of classifying expenditures as mandatory, normal capital or justifiable.

1 updated scope following the completion of the *LED Street Lighting Replacement*
2 project in 2026.

3
4 The 2027 scope of the *Replacement Street Lighting* program is the first time the
5 program will be executed subsequent to the completion of the *LED Street*
6 *Lighting Replacement* project. As a result, any street light luminary replacements
7 which are required in 2027 will be completed under the 2027 *Replacement Street*
8 *Lighting* program exclusively.

- 9
10 b) The deficiencies identified in both quotations refer to deficiencies other than with
11 the luminaire and are the same deficiencies.

12
13 The scope of the *LED Street Lighting Replacement* project involved only the
14 replacement of existing high-pressure sodium street light luminaires with LED
15 luminaires.² Any deficiencies identified outside of the luminary were outside the
16 scope of the *LED Street Lighting Replacement* project and were not charged to
17 the project. Labour and materials required to correct deficiencies identified
18 through the *LED Street Lighting Replacement* project other than replacement of
19 the luminary were charged to the *Replacement Street Lighting* program when
20 completed.³

- 21
22 c) As explained in parts a) and b) of this response, there has been no overlap in the
23 scopes of work of the *LED Street Lighting Replacement* project and the
24 *Replacement Street Lighting* program.

25
26 Newfoundland Power's longstanding approach to streetlight maintenance has
27 been to address all identified deficiencies when a crew arrives on site at a
28 streetlight location. This approach results in cost savings by avoiding the
29 additional labour costs of multiple crews visits to the same location. This has
30 been the case historically for HPS bulb replacements and in recent years when
31 replacing an HPS fixture with an LED fixture.

32
33 While there are no direct cost savings realized in the *Replacement Street Lighting*
34 program because of work charged to the *LED Street Lighting Replacement*
35 project, resolving all identified deficiencies improves the overall efficiency of
36 Newfoundland Power's street light maintenance by reducing multiple visits by
37 Newfoundland Power crews.

² See Newfoundland Power's *LED Street Lighting Replacement Plan* filed in the Company's *2021 Capital Budget Application*.

³ Correcting deficiencies related to Street Lighting under the *Replacement Street Lighting* program is consistent with Newfoundland Power's historical practice described in part a) above.