

1 Q. **Reference: RRAS, 2022 Update, Vol. I, page 3, note 10 (27 pdf); p. 30 (54 pdf)**

2 Citation 1 (page 3, note 10):

3 Pending the outcome of the *Network Additions Policy – Labrador Interconnected*
4 *System* process, there may be a requirement to assess the Labrador
5 Interconnected System on a sub-regional basis, due to the potential for growth
6 in load requirements.

7 Citation 2 (page 30):

8 As the LIL bipole forced outage rate increases and bipole outages become the
9 primary driver of generation shortfall on the Island Interconnected System,
10 there is far less correlation between Labrador Interconnected System load and
11 Newfoundland and Labrador Interconnected System reliability. Given the
12 material increase of the LIL bipole forced outage rate assumption compared to
13 the 2018 Filing and 2019 Update, it may be necessary to reassess this approach
14 and instead adopt separate planning criteria for the Island Interconnected
15 System and the Labrador Interconnected System.

16 **a)** Please confirm that, for Hydro, “planning on a regional basis” refers to planning the NLIS
17 system as a whole, and “planning on a sub-regional basis” refers to separate planning for
18 the IIS and the LIS.

19 **b)** Does Hydro currently believe that it is necessary to perform planning on a sub-regional basis
20 for the IIS and for the LIS, for both energy and capacity? If not, please explain why not.

21 **c)** Please indicate if the 2023 Update will include a detailed long-term plan to meet energy and
22 capacity needs in both the IIS and the LIS. If not, please explain why not.

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25 A. **a)** Newfoundland and Labrador Hydro (“Hydro”) confirms that planning on a regional basis
26 refers to planning for the Newfoundland and Labrador Interconnected System while
27 planning on a sub-regional basis refers to planning for the Island Interconnected System and
28 Labrador Interconnected System. However, it is important to note that this approach may
29 not lead to the development of separate reliability criteria for the Labrador Interconnected
30 System in the absence of significant load growth in Labrador.

1 **b)** In the “Reliability and Resource Adequacy Study,”¹ Hydro proposed the migration to
2 planning on a regional and sub-regional basis. As a part of this migration, separate capacity
3 and energy criteria were proposed for the Island Interconnected System and the
4 Newfoundland and Labrador Interconnected System. At the time it was determined that
5 there was no requirement for planning criteria for the Labrador Interconnected System due
6 to the high reliability of the TwinCo² and Recapture Blocks and the fact that the peak load
7 and energy in Labrador could be entirely supplied by both blocks.

8 Currently, there is the potential for significant load growth on the Labrador Interconnected
9 System, which would be mostly driven by significant industrial growth in the region. Once
10 peak load and energy requirements in Labrador exceed TwinCo and Recapture Blocks
11 capacity it will be necessary to develop separate criteria for the Labrador Interconnected
12 System. This will be addressed in the Reliability and Resource Adequacy Study – 2023
13 Update.

14 The development of reliability criteria for the Newfoundland and Labrador Interconnected
15 System was based on the assumption that the Labrador-Island Link (“LIL”), as the
16 transmission line between the Labrador Interconnected System and the Island
17 Interconnected System, would be highly reliable. Based on the significant increase in the
18 bipole forced outage rate assumptions for the LIL in the “Reliability and Resource Adequacy
19 Study – 2022 Update,”³ it is necessary to revisit the recommendation to adopt reliability
20 criteria for the combined Newfoundland and Labrador Interconnected System. This will be
21 addressed in the Reliability and Resource Adequacy Study – 2023 Update.

22 **c)** Yes, the Reliability and Resource Adequacy Study – 2023 Update will contain an expansion
23 plan that will satisfy the capacity and energy criteria for the Island Interconnected System
24 and Labrador Interconnected System.

¹ “Reliability and Resource Adequacy Study,” Newfoundland and Labrador Hydro, rev. September 6, 2019 (originally filed November 16, 2018).

² Twin Falls Power Corporation (“TwinCo”).

³ “Reliability and Resource Adequacy Study - 2022 Update,” Newfoundland and Labrador Hydro, October 3, 2022.