| 1  | Q. | Reference: Volume II, Terminal Station Refurbishment and Modernization (2021-2022),              |
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| 2  |    | Section 2.1.7 – Perform Grounding Upgrades, Table 10   |
| 3  |    | If step and touch potential analysis and integrity assessments have not been completed on the    |
| 4  |    | stations identified for grounding upgrades to date, upon what basis is Hydro estimating costs in |
| 5  |    | 2022 for the grounding upgrades?   |
| 6  |    |  |
| 7  |    |  |
| 8  | A. | The estimating costs for 2022 are based on Newfoundland and Labrador Hydro's ("Hydro") past      |
| 9  |    | experience with upgrades required for similar size stations. Due to the fact that step and touch |
| 10 |    | potential deficiencies are a safety concern and Hydro has experience that shows upgrades are     |
| 11 |    | typically required following analysis, grounding upgrades has been estimated within this project |
| 12 |    | for 2022.  |