Office of the Consumer Advocate

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November 24, 2026

Via Email

Board of Commissioners of Public Utilities
P.O. Box 21040
120 Torbay Road
St. John's, NL A1A 5B2

Attention: Mike McNiven (Board Secretary)

Re: Newfoundland Power Inc.'s 2027 Wesleyville & Greenhill Thermal Generation Supplemental Application – CA Requests for Information

Please find enclosed the Consumer Advocate's requests for information CA-NP-001 to CA-NP-064 in relation to Newfoundland Power Inc.'s 2027 Wesleyville & Greenhill Thermal Generation Supplemental Application.

Should you have any questions, please contact the undersigned.

Yours truly,

CONSUMER ADVOCATE



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IN THE MATTER OF the *Public Utilities Act* (the *"Act")*;

AND

IN THE MATTER OF an application by Newfoundland Power Inc. for an order pursuant to section 41 of the Act approving supplemental capital expenditures required for the refurbishment of thermal facilities at Wesleyville and Greenhill.

CONSUMER ADVOCATE
REQUESTS FOR INFORMATION
CA-NP-001 to CA-NP-064

Issued: November 24, 2026

CA-NP-001 (Reference Application, para. 5) It is stated "*The WES and GRH facilities provide three principal functions on the Island Interconnected System ("IIS"): (i) local reliability support; (ii) regional transmission system support; and (iii) firm, dispatchable capacity. The WES facility provides transmission-system support in Central Newfoundland and local reliability support to customers supplied by the Gambo–Wesleyville 66 kV transmission system. The GRH facility provides transmission voltage support and local reliability support on the Burin Peninsula. Both facilities also provide firm, dispatchable capacity to the IIS*."

a) Given the importance of these facilities to the Island Interconnected System (IIS), does NP know the basis for Hydro's assumption in the Reliability and Resource Adequacy Study that these facilities would be retired in 2030?
b) What role did Hydro play with respect to the assessments of these projects? Please file any documentation submitted by Hydro with respect to the assessments of these projects.
c) How did NP incorporate experience relating to the Avalon CT project including: i) cost estimates and Hydro's view that the costs of subsequent CTs will increase dramatically, ii) long procurement times, and iii) IIS fuel supply? Was this information provided to the consultants employed by NP to assess the WES and GRH projects?
d) What lessons learned from the Avalon CT project have been applied to the WES and GRH projects?

CA-NP-002 (Reference Application, para. 11) It is stated "*Newfoundland Power undertook early engagement with municipal representatives, local employers and other stakeholders in the Bonavista Bay north coast and Burin Peninsula regions concerning the condition of the existing facilities, the need for replacement generation, the proposed project scope and the reliability functions provided by the WES and GRH facilities. Newfoundland Power received 11 written expressions of support from municipal and business stakeholders in the two regions."* The objectives of the stakeholder engagement are identified in "Wesleyville and Greenhill Thermal Facility Refurbishments" (page 40).

a) Did early engagement include Indigenous groups? Will these groups be included in future engagements?
b) Were project costs, rate impacts and the trade-off between reliability and cost an objective of these discussions? For example, did NP quantify the expected reliability improvement resulting from these projects that are expected to result in a rate increase of 2.2% (Wesleyville and Greenhill Thermal Facility Refurbishments, page 36)? If not, why not?
c) Were environmental impacts of the proposed projects an objective of these discussions? Did NP quantify the environmental impacts of the proposed projects and provide a comparison to more environmentally-friendly alternatives?

d) Did the "expressions of support" indicate that the expected improvement in reliability resulting from the projects justified a 2.2% increase in rates and the potential detrimental environmental impact of the proposed projects?
e) Will project costs, rate impacts, the trade-off between reliability and cost and environmental impacts be part of the discussion at future engagements?

CA-NP-003 (Reference Application, para. 14) It is stated "*Appendix E includes Association for the Advancement of Cost Engineering (AACE) Class 3 cost estimates provided by Stantec to support the proposed capital expenditures for the WES and GRH refurbishments.*" In terms of accuracy, how do these cost estimates compare to the accuracy of Hydro's current estimate for the Avalon CT?

CA-NP-004 (Reference Application, para. 16) It is stated "*The refurbishment of the WES and GRH facilities is consistent with the provincial power policy as defined in Section 3(b)(iii) of the EPCA, which requires power to be delivered to consumers in the province at the lowest possible cost, in an environmentally responsible manner, consistent with reliable service*." Please explain how these projects are "environmentally responsible".

CA-NP-005 (Reference Application, Schedule B, Greenhill Substation Upgrades for Thermal Generation) It is stated (page 2) "*The Greenhill Substation Upgrades for Thermal Generation project involves the replacement of deteriorated equipment and the addition of new equipment at the Greenhill ("GRH") Substation located in the community of Grand Bank on the Burin Peninsula (the "GRH facility"). This work is required to facilitate the Greenhill Thermal Generation Facility Refurbishment project*."
a) Would this project be needed if Greenhill were not refurbished?
b) Would this project be needed if Greenhill were not uprated from 20 MW to 30 MW?

CA-NP-006 (Reference Application, Schedule B, Greenhill Substation Upgrades for Thermal Generation) Since this project does not begin until 2030, why is NP requesting approval of this project at this time rather than applying at the same time as the *2030 Greenhill Substation Refurbishment and Modernization* project?

CA-NP-007 (Reference Application, Schedule B, Greenhill Substation Upgrades for Thermal Generation) If the Greenhill Thermal Generation Facility refurbishment project were limited to one new 15 MW CTG:
a) How would the extent of necessary substation upgrades be affected and what would be the cost savings? In particular, would the second generator step-up transformer and related work be required?

b) How would the composition and cost of the future budget request for the 2030 *Greenhill Substation Refurbishment and Modernization* project (footnote 1, page 4) be affected?

CA-NP-008 (Reference Application, Schedule B, Greenhill Substation Upgrades for Thermal Generation) If the Greenhill Thermal Generation Facility were retired without replacement would it still be necessary to upgrade the Greenhill substation or would it be retired as well?

CA-NP-009 (Reference Application, Schedule B, Greenhill Substation Upgrades for Thermal Generation) If the Greenhill Thermal Generation Facility refurbishment project were to use either RICE or BESS rather than the proposed two 15 MW CTGs, how would the need for and cost of the Application's proposed substation upgrades be affected?

CA-NP-010 (Reference Application, Schedule B, Greenhill Thermal Generation Facility Refurbishment – Generation - Thermal) It is stated (page 8) "*Years one through three are anticipated to focus on detailed engineering, development of equipment specifications, tendering activities, and procurement of long-lead time equipment. This period also includes advancement of project planning and preparation of construction packages. Year four is expected to focus on site preparation activities, including civil and structural works, yard expansion, and building works. Year five is expected to encompass construction, installation of mechanical and electrical systems, commissioning, and integration of the new facilities into service.*" A similar statement is made respecting the WES project (page 13). Why is NP seeking Board approval for the full cost of these projects now given that construction will not start for another 4 years? Would it be more appropriate for NP to seek Board approval for early execution activities in an effort to produce a more accurate cost estimate and risk assessment before the Board commits to the significant budget amount of $242.1 million?

CA-NP-011 (Reference Application, Schedule B, Greenhill Thermal Generation Facility Refurbishment) Table 1 (page 9) indicates expenditure of almost $37 million in 2027 on material. Why is such a large expenditure on material required in the first year of this five-year project?

CA-NP-012 (Reference Application, Schedule B, Greenhill Thermal Generation Facility Refurbishment) To the extent that the existing generating capacity at GRH will not be available over the five-year project period, will alternate capacity be available?

CA-NP-013 (Reference Application, Schedule B, Greenhill Thermal Generation Facility Refurbishment) It is stated (page 11) "*The assessment concluded that CTG technology is the recommended alternative as it provides the required firm, dispatchable capacity and synchronous system support while offering lower estimated lifecycle costs, reduced implementation complexity, and greater maintenance flexibility relative to the other technically feasible*

alternatives." Has Hydro expressed its support for these projects from the perspective of providing needed capacity to the IIS within the framework of the Reliability and Resource Adequacy Study? If so, please provide relevant documentation.

CA-NP-014 (Reference Application, Schedule C, Wesleyville Substation Upgrades for Thermal Generation) Would the Wesleyville Substation Upgrades project still be required if the Wesleyville CTG is retired without replacement?

CA-NP-015 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments) The report indicates (page 1) that there are three services provided by NP's thermal generating facilities: (i) local reliability support to customers in rural areas; (ii) regional transmission support; and (iii) IIS system capacity.

a) Which of these is the primary and most important function of the Greenhill Thermal Facility and are all three services location-specific?
b) Which of these is the primary and most important function of the Wesleyville Thermal Facility and are all three services location-specific?

CA-NP-016 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments) It is stated (page 4) "*The WES CTG is currently derated from 14.7 MW to 8 MW due to high vibration in the gearbox and operation duration is limited as a result of PT bearing overheating*."

a) When did this derating take place and what actions has NP taken to restore the WES CTG to its full 14.7 MW rating?
b) Since the derating to 8 MW how effectively has the facility performed each of the three services that it provides (i.e., local reliability support, regional transmission support and IIS system capacity)?
c) Is the 8 MW capacity adequate to meet forecast capacity requirements in the region?

CA-NP-017 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments) Since the derating of the GRH CTG from 25 MW to 20 MW in 1984 (page 5):

a) What actions has NP taken to restore it to its full 25 MW rating?
b) How effectively has the facility performed each of the three services that it provides, i.e., local reliability support, regional transmission support and IIS system capacity?
c) Is the 20 MW capacity adequate to meet forecast capacity requirements in the region?

CA-NP-018 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments) Extend the historical operating data for WES and GRH given in Table 1 (page 11) by presenting the information on an annual basis and also include annual fuel consumption and annual generation (MWh).

CA-NP-019 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments) It is stated (page 14) "*... commercially available CTGs are available in configurations capable of utilizing alternative fuel sources or accommodating future fuel conversions."* Specifically, what alternative fuels?

CA-NP-020 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments) Please expand Table 2 (page 14) to provide a direct comparison of the 3 x 15 MW CGTs proposed at Wesleyville and Greenhill to Hydro's proposed 3 x 50 MW Avalon CT project. Further, please show the value of each facility based on forecast marginal costs of capacity and energy, and the value of the Greenhill and Wesleyville projects based on the thermal generation credit NP and its customers would receive in Hydro's cost of service study. Please comment on any disparities between the projects.

CA-NP-021 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments) It is stated (page 16) "*While BESS can provide fast reactive power support and contribute to voltage regulation, it is constrained by its energy-limited nature*."

a) Is the CGT alternative likewise energy-limited given fuel supply issues on the IIS and government environmental initiatives?
b) Please identify the planned operating regime for the WES and GRH projects and explain how fuel will be procured, shipped to site, stored and utilized to meet the expected operating regime.
c) How were the environmental benefits of BESS relative to the proposed projects quantified in the analysis of alternatives?
d) How does the energy-limited nature of BESS preclude it from meeting the planned operating regime of the WES and GRH projects?
e) What alternatives might be combined with BESS to overcome its energy-limited nature; e.g., behind-the-meter batteries installed at customer sites?

CA-NP-022 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments) It is stated (page 17) "*Condition assessments concluded that both the GRH and WES CTGs have reached the end of their service lives and recommended retirement of the units within the next one to three years.*"

a) Please quantify the risk of failure in the next 3 years, and in the 3-year period beyond 2029.
b) Was Stantec (Appendix A, Thermal Generation Fleet Review) asked to quantify the risk of failure of the WES and GRH facilities?

CA-NP-023 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments) It is stated (page 18) "*On this basis, the option to maintain and continue operating the existing WES and GRH CTG units was determined not to be a feasible long-term alternative for providing the firm capacity, system*

support, and reliability required for the Central Newfoundland transmission system."

a) Was a cost estimate for this option developed? If so, please file.
b) Is Stantec (Appendix A, Thermal Generation Fleet Review) confident that the WES and GRH facilities can operate safely and reliably for the next 3 years?
c) Does Stantec believe that no amount of maintenance and capital investment can extend the lives of these facilities beyond 3 years?

CA-NP-024 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments) It is stated (page 18) "*The Planning Study establishes the need for approximately 15 MW of firm, dispatchable capacity at WES and approximately 30 MW of firm, dispatchable capacity at GRH*."

a) Please explain why there is a "need" for 45 MW of firm capacity at these sites when the existing facilities are providing only 28 MW.
b) Are the existing facilities being proposed for retirement because of obsolescence or inadequacy?

CA-NP-025 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments)

a) Please provide a diagram showing the management structure for these projects showing positions and responsibilities, decision points and communications with the Board.
b) Please identify projects similar to the proposed WES and GRH projects that NP has managed in recent years.

CA-NP-026 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments) It is stated (page 30) "*Consistent with AACE Class 3 estimating practices, Stantec's opinion of estimate accuracy is approximately +30% / -20%, reflecting the current level of project definition and the remaining uncertainty associated with scope refinement, procurement, and detailed engineering activities*." What would need to happen with respect to CTG cost and fuel supply before the proposed projects were no longer the favoured alternative?

CA-NP-027 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments) Regarding the projected pro forma approximate increase in customer rates (page 36) of 2.2% in 2032:

a) Is the 2.2% increase relative to customers' rates in 2031?
b) What is the pro forma rate increase in 2032 expressed in terms of cents per kWh?

CA-NP-028 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments) Regarding the Clean Electricity Regulations (CER):

a) According to footnote 41 (page 39), the CER does not permit carbon dioxide emissions after 2049. With in-service beginning in 2031, it appears that this limits the full availability of the GRH facility to

approximately 20 years. (i) Does NP have evidence to suggest that continuing the GRH facility's current scope of operations beyond 2049 will be permitted? (ii) It is stated (page 40) that "*Beyond 2049, compliance with the CER would be subject to regulatory requirements in effect at that time,…*" Please reconcile that statement with footnote 41.

b) Revise Table 2 (page 14) cost estimates for GRH based on a service life of 20 years.
c) Would removal/retirement of one of the proposed 15 MW CTGs at GRH prior to 2049 be a feasible means of remaining in compliance with the CER?
d) Does footnote 41's statement that the CER does not permit carbon dioxide emissions after 2049 apply to the proposed WES 15 MW CTG?

CA-NP-029 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments) It is stated (page 45) "*Newfoundland Power will report periodically to the Board on material developments affecting project scope, cost, schedule and execution.*" Please identify the proposed reporting trigger points and schedule.

CA-NP-030 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix A, Thermal Generation Fleet Review by Stantec) Stantec concludes (page iii) that NP "*should plan to retire*" all 4 of the facilities included in the assessment. Stantec states that both WES and GRH have (page iii) "*reached the end of its service life due to its age, condition and lack of vendor support*". With respect to Grand Bay CTG and the Port aux Basques DEG, Stantec states that they (page iii) "*are nearing their end of service life.*"

a) When does NP plan to remove WES and GRH from service and why?
b) What maintenance expenditures and capital projects are planned and expected between now and the date when WES and GRH are removed from service?
c) What are NP's plans with respect to retirement of Grand Bay CTG and the Port aux Basques DEG and why?
d) What maintenance expenditures and capital projects are planned and expected between now and the date when Grand Bay CTG and the Port aux Basques DEG are removed from service?

CA-NP-031 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix A, Thermal Generation Fleet Review by Stantec) It is stated (page 6) regarding the electrical generator at GRH, "*In 2016, Brush provided a 25,000-hour inspection and recommended several maintenance actions including stator rewinding, rotor replacement (including new retaining rings), automatic voltage regulator (AVR) upgrade, enclosure repainting and bearing shaft seal refurbishment. The latter two items were completed by NP*." Did NP complete stator rewinding and rotor replacement? If not,

why not?

CA-NP-032 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix A, Thermal Generation Fleet Review by Stantec) It is stated (page 7) "*The Greenhill facility includes three fuel oil storage tanks, each with a capacity of 100,000 litres. With usable capacity at 90% of installed tank capacity, this provides approximately 38 hours of operation at the derated load of 20 MW*." Has this been adequate? Has NP ever run out of fuel at this site?

CA-NP-033 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix A, Thermal Generation Fleet Review by Stantec) It is stated (page 16) "*Sulzer Turbo Services completed an additional boroscope inspection in 2024 and classified the unit as being in fair condition, except for the #7 discharge nozzle that was found with a significant crack. The unit was removed from service and repaired by Sulzer at their Texas facility in late 2024. The unit is now back at Wesleyville*." Please expand on this statement. What was the cost of the repair, how long was the unit out of service and what is the current status of the unit?

CA-NP-034 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix A, Thermal Generation Fleet Review by Stantec) It is stated (page 17) "*Upon review, Alba Power recommended the replacement of the gearbox.*" Was the gearbox replaced, and if so, when and at what cost?

CA-NP-035 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix A, Thermal Generation Fleet Review by Stantec) It is stated (page 19) "*This provides approximately 33 hours of operation at the derated load of 8 MW (with usable capacity at 90% of installed tank capacity).*" Has this been adequate? Has NP ever run out of fuel at this site?

CA-NP-036 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix A, Thermal Generation Fleet Review by Stantec) It is stated with respect to Grand Bay CTG (page 26) "*It is recommended that the trailer be refurbished and strengthened or be replaced to avoid damage as a result of the trailer's deteriorating condition."* What is NP's plan with respect to the trailer including schedule and cost?

CA-NP-037 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix C, Wesleyville & Greenhill Planning Study) It is stated (page i) "*This alternative would provide approximately 15 MW of firm, dispatchable capacity at WES and approximately 30 MW at GRH, together with synchronous system support, including the capability to operate in synchronous condenser mode*." What other capacities were considered?

CA-NP-038 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments,

Appendix C, Wesleyville & Greenhill Planning Study) It is stated (page 4) "*Hydro's resource adequacy planning includes specific analysis of extended outages of the Labrador Island Link ("LIL"). Hydro has stated that the impact of a LIL bipole outage during the winter period would be significant, regardless of duration*."

a) To what extent can the WES and GRH facilities assist during a LIL bipole outage?
b) Are capacity additions on the IIS based upon the need to satisfy the LIL Shortfall Event criterion which is the loss of the LIL (both poles) for a 6-week period in winter?
c) Has the Board accepted the LIL Shortfall Event as a planning criterion for the IIS?

CA-NP-039 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix C, Wesleyville & Greenhill Planning Study)

a) Please provide relevant reliability criteria for the WES and GRH facilities in the past 10 years including the number of failed starts.
b) Please provide relevant feedback related to reliability from customers in the regions where the WES and GRH facilities are located.

CA-NP-040 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix C, Wesleyville & Greenhill Planning Study) Table 9 (page 18) identifies 4 potential large loads in the study area.

a) Would any of these four potential large load customers be NP customers or would they be Hydro customers?
b) Please file a copy of the connection policy relevant to large new loads on the IIS and explain how costs for new supply facilities are allocated between new and existing large-load customers.
c) Is there a single connection policy for the IIS or do Hydro and NP each have their own?

CA-NP-041 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix C, Wesleyville & Greenhill Planning Study) Regarding Table 14, (page 23):

a) Extend Table 14 to show the figures for 2001 and 2025.
b) Provide a breakdown of the 3,567 customers on the Gambo-Wesleyville system by customer class, with domestic customers differentiated by domestic-regular, domestic-all electric, and domestic-seasonal.

CA-NP-042 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix C, Wesleyville & Greenhill Planning Study) Regarding the data on the Burin Peninsula 66 kV System:

a) Extend Table 17 (page 27) to include the corresponding figures for 2001 and 2025.

b) Provide a breakdown of the 4,392 customers on the Burin Peninsula 66 kV system by customer class, with domestic customers differentiated by domestic-regular, domestic-all electric, and domestic-seasonal.

CA-NP-043 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix C, Wesleyville & Greenhill Planning Study) Under Alternative 1, there is an associated $41.3 million expenditure by Hydro (Table 19, page 32). Is that expenditure included in Hydro's 2027 CBA Five-Year Capital Plan?

CA-NP-044 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix C, Wesleyville & Greenhill Planning Study) Under Alternative 2 (Table 20, page 35) there would be a new 66 kV Transmission Line from GAM to WES but not in the case of Alternative 1 (Table 19, page 32).

a) Would that new transmission line be sufficient to address local reliability issues if the WES generation facility were no longer operating?
b) How old is the existing transmission line and is its condition such that a new line would be needed within a few years after 2031 if Alternative 1 is selected?

CA-NP-045 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix C, Wesleyville & Greenhill Planning Study) Footnote 83 (page 38) indicates that GRH would operate approximately 74 hours a year on average. Would it be operating at the proposed 30 MW capacity during all or most of those hours?

CA-NP-046 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix C, Wesleyville & Greenhill Planning Study) Footnote 83 (page 38) indicates that WES would operate for approximately 105 hours a year on average. Would it be operating at the proposed 15 MW capacity during all or most of those hours?

CA-NP-047 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix C, Wesleyville & Greenhill Planning Study) It is stated (page 39) "*Hydro has confirmed that its assessment will consider fuel requirements for all thermal generating sources on the Island, including the proposed facilities*." What is the status of Hydro's assessment?

CA-NP-048 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix C, Wesleyville & Greenhill Planning Study, Attachment B, 2027-2036 Loop Assessment) It is stated (page 25) "*Under the status quo scenario, and without consideration of the proposed new industrial load, the SSD-STB Loop can support forecast load growth to 2036, provided WES and GRH can supply at least 8 MW and 20 MW, respectively, and MG2 is*

available at COB." Would that conclusion also hold if WES and GRH could supply 15 MW each?

CA-NP-049 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix C, Wesleyville & Greenhill Planning Study, Attachment B, 2027-2036 Loop Assessment) It is stated (page 25) "*Further load flows were conducted assuming up to 93MW of large industrial load additions. NP's proposed replacement units at WES (15MW) and GRH (30MW) along with a third 125 MVA transformer at STB were found to resolve all planning violations. Moreover, transformer upgrades at STB may be required if either one of the large load customers were to materialize.*"

a) When and how probable are these potential additional loads?
b) If the replacement unit at WES were 15 MW and GRH were limited to a single 15 MW unit, rather than two 15 MW units: (i) Would planning violations occur? (ii) If so, then if the additional industrial load were 50 MW, rather than 93 MW, would planning violations occur?

CA-NP-050 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix C, Wesleyville & Greenhill Planning Study, Attachment C) In TP-TN-307, Hydro indicates (page 2) "*The Transmission Planning analysis was assessed using the high growth forecast with all the potential industrial customer load added to the SSD/STB loop. There is uncertainty as to whether these loads will materialize.*"

a) What is a reasonable probability estimate associated with (i) the high growth forecast and (ii) the specific industrial projects?
b) Is the additional potential industrial load of 93 MW included in Hydro's high growth forecast and also in its reference case forecast?
c) Provide a copy of *Island Interconnected System Peak Demand Forecast - Spring 2025* referenced in footnote 5.

CA-NP-051 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix C, Wesleyville & Greenhill Planning Study, Attachment D, Burin Peninsula Reactive Power Support Analysis) If, rather than disconnecting the GRH thermal facility, a new 15 MW CTG were installed in place of the existing 20 MW generator then would the concerns over voltage regulation on the Burin Peninsula as discussed in the Hatch report be adequately addressed?

CA-NP-052 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix C, Wesleyville & Greenhill Planning Study, Attachment E, Summary of Net Present Value Parameters) Table E-3 (page 2) shows the expected fuel consumption hours for the proposed WES and GRH facilities.

a) Please state the percentage of the time that each of these facilities is expected to operate, excluding test runs.
b) How does this compare to operating hours at the existing facilities?
c) Is the need to "condition" fuel owing to the very limited operation of

these facilities?
d) Has there been a need to "condition" the fuel at the existing facilities?
e) What is the maximum number of hours that the proposed facilities are expected to operate?
f) How does the number of operating hours for the proposed facilities compare to those expected for Hydro-owned thermal generation facilities?

CA-NP-053 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix C, Wesleyville & Greenhill Planning Study, Attachment E, Summary of Net Present Value Parameters)
a) In the NPV analysis of Alternative 1 (page 3) is the cost of the 2030 *Greenhill Substation Refurbishment and Modernization* project included?
b) For each alternative, why are there not two separate NPV calculations: one for Greenhill substation and generation facility and one for Wesleyville substation and generation facility?
c) For the NPV analysis of Alternative 2 (page 4) the bulk of the expenditure would be by Hydro (Appendix C, Table 20, page 35) but it appears that the NPV analysis of Alternative 2 is carried out as if NP were undertaking all expenditure; i.e., it uses NP's capital structure and WACC. If that is the case, is it methodologically appropriate to do so?

CA-NP-054 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix D, Generation Technology Assessment) The Sargent & Lundy report in Table 5-4 states (page 33) "*Includes the cost to periodically install additional battery modules to account for degradation and maintain the plant's desired capacity. Estimates provided assume 7.5% capacity augmentation every 3 years over a 20-year useful life. Six total augmentations are expected over the lifetime of the BESS*." Is there a comparable cost added to the thermal generation alternatives considering that both the WES and GRH facilities have for some time been derated from design capacity? Has the potential for such deratings been incorporated in NP's analysis of the proposed projects?

CA-NP-055 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix D, Generation Technology Assessment) The Sargent & Lundy report (pages 48-49) suggests that post-2049 the Greenhill CTG facility would be permitted to operate under emergency conditions only. How would such a restriction impede Greenhill's scope to provide each of the three services that it provides: (i) local reliability; (ii) regional transmission support; and (iii) IIS system capacity?

CA-NP-056 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix D, Generation Technology Assessment) The Sargent & Lundy report (page 59) favours CTGs over BESS "*primarily due to the BESS*

resource's finite energy reservoir and thus inability to provide continuous power injection during extended system outages / emergency events."

a) Would pairing a BESS facility with a wind generating facility substantially address the concerns over BESS's finite energy reservoir?
b) At any stage of the development of the Application did Sargent & Lundy consider wind generation coupled with BESS as an alternative to CTGs for either GRH or WES?
c) What would be the cost of installing a 15 MW CTG and 15 MW BESS rather than two 15 MW CTGs at GRH?
d) What would be the cost of installing a 15 MW CTG and 15 MW wind turbine rather than two 15 MW CTGs at GRH?

CA-NP-057

(Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix D, Generation Technology Assessment) A number of utilities, e.g., BC Hydro and Green Mountain Power in Vermont, are investigating or have established virtual power plants by installing home batteries, which improve local reliability and grid reliability (bchydro.com/news/press_centre/news_releases/2025/virutal-power-plant.html and electrek.co/2026/07/28/vermonts-largest-energy-source-is-now-a-virtual-power-plant/). Has NP or Sargent & Lundy examined the merits of such an approach to rural areas like the Burin Peninsula and the Wesleyville area?

CA-NP-058

(Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix E, Gas Turbine Replacement Cost: Design Basis Memorandum by Stantec) An extensive list of potential environmental permitting requirements is provided along with a long list of caveats associated with the cost estimate.

a) Which of these requirements would apply to BESS technology?
b) How was environmental risk quantified in the economic evaluation of alternatives?
c) What is the risk and probability that the WES and GRH facilities will become stranded; e.g., due to improvements in BESS storage capacity, efficiency and costs?

CA-NP-059

(Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix C, Wesleyville & Greenhill Planning Study, pages 18, 23–30 and 39–40, Tables 9, 14, 17, 22 and 23; Application, Schedule B, pages 2–5 and 8–12)

a) Please compare the filed 15 MW at Wesleyville and 30 MW at Greenhill with 15 MW at each site and with one Greenhill unit initially and a second installed only when required. Show the least-cost supporting works for each case, including any additional capacity required elsewhere. Identify the first year and planning criterion each case fails under existing and committed load. Also screen a build at only one site paired with targeted measures at the other. Price the most promising

feasible single-site option.

b) For the second Greenhill unit, provide its incremental installed cost, annual revenue requirement, present cost and incremental reliability benefit. Distinguish shared works needed with the first unit, provision for a future unit and expenditures avoided if the second unit is never built. Identify any loss of joint procurement savings.

c) State the load, reliability or system-capacity trigger for ordering unit two, how much advance notice NP needs and the cost of waiting. Identify any lower-cost interim measure that can meet the criterion until that trigger is reached.

CA-NP-060 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix C, Wesleyville & Greenhill Planning Study, pages 4–6 and 32–39, particularly Table 20, footnote 79, and Attachment E, Table E-6, footnote 4; Hydro's 2024 Resource Adequacy Plan, Appendix B, printed page 38)

a) Table 20 assigns $261.8 million to 45.6 MW elsewhere on the Island using a Class 5 estimate. Identify the next resource purchase, contract or expansion that Hydro would actually advance, defer, resize or avoid, and in which year, for 0, 28, 30 and 45 MW at the two NP sites. Identify the baseline used in Hydro's current plan and when each NP addition entered it.

b) Provide the dependable winter MW, expected unserved energy and loss-of-load measure for the cases assessed, including delivery to the area of need and competing local calls. Distinguish the ordinary adequacy case from Hydro's extended Labrador Island Link outage scenario. Identify overlap with Bay d'Espoir Unit 8, the Avalon project and other committed resources.

CA-NP-061 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix C, Wesleyville & Greenhill Planning Study, pages 32–40, Tables 19, 20, 22 and 23, and Attachment E, Tables E-1 to E-6)

a) Please file the working spreadsheets with formulas and source inputs for both alternatives and the filed base and sensitivity cases. Provide the two Table 23 changes separately and together. Identify the owner, year, price basis, useful life and in-service date for each material investment. Show, separately, the projects treated as common and the triggering assumptions that make them common.

b) Reconcile the sum of the 40 annual present-worth entries in Tables E-5 and E-6 to their respective 2066 totals. Show the terminal balances, salvage, remaining service life and calculation of each year's final column. Explain why the post-2031 thermal sustaining-capital series is the same in both cases.

c) Show how the calculation treats financing during construction, pre-service capital revenue requirement, tax, capital cost allowance and depreciation for each owner. Provide a utility-specific revenue-

requirement case and a consolidated resource-cost case on a common discounting basis. Identify the capital, fuel or timing changes needed to reverse the ranking.

CA-NP-062 (Reference Application, paras. 12 and 17 and Schedule A; Application, Schedule B, pages 9 and 14; Wesleyville & Greenhill Thermal Facility Refurbishments, pages 36–37 and 42–45; Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix E, preliminary schedules)

a) Of the $71.195 million proposed in 2027, $36.992 million at Greenhill and $18.451 million at Wesleyville are classified as material. By major package and site, distinguish a refundable reservation, non-refundable deposit, progress payment and transfer of title. Provide payment, cancellation, assignment, security, warranty-start and delivery terms available to NP. Identify installation labour embedded in material or other lines.

b) Specify the minimum authority and amount required to preserve delivery slots pending firm prices, site investigations and environmental decisions. Compare full authorization, a capped first phase and a one-unit order with an option. Show the latest practicable decision date, amount irreversibly committed and cost and schedule consequences for each.

c) Identify work already authorized or paid for, its funding source, and the procurement and Board reporting milestones. Quantify feasible cost or schedule thresholds for a return to the Board before further material commitments. Explain the 2027 site-preparation dates in Stantec's schedule relative to the main report's fourth-year description.

CA-NP-063 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, Section 9.5, page 36, footnote 37; Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix C, Wesleyville & Greenhill Planning Study, Attachment E, Tables E-4 and E-5; Hydro 2026 GRA, Volume I, 2027 test year, Schedule G 1.5; Board letter of November 23, pages 1–2)

a) Please reproduce the approximately $25 million and 2.2% figures for 2032. Reconcile them line by line to Table E-5's 2032 capital revenue requirement of $24.084 million, operating costs of $3.774 million and combined cost of $27.857 million. Identify the treatment of fuel, sustaining capital, costs of existing plant avoided, tax, purchased power and any Hydro reimbursement.

b) Provide the annual change in NP revenue requirement and wholesale power purchases for 2027–2036 for full build and one Greenhill unit. Show the existing credit that would be lost on retirement, the additional credit on replacement, eligible kW, reserve adjustment, demand rate, NP cost share, timing and net dollars. Identify any payment for energy, fuel or ancillary services and who bears its cost.

c) Show the consolidated Island cost and the indicative effect on NP and other affected classes separately, with and without a revised credit. State

the sales and revenue denominators and illustrate the annual residential bill change at a stated consumption level. Identify inputs requiring a future rate decision.

CA-NP-064 (Reference Wesleyville & Greenhill Thermal Facility Refurbishments, pages 21, 24, 39–40 and 43; Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix C, Wesleyville & Greenhill Planning Study, pages 37–39 and Attachment E, Table E-3; Wesleyville & Greenhill Thermal Facility Refurbishments, Appendix E, Design Basis Memorandum, Section 6.1.3)

a) Reconcile the claimed 48 hours at rated load to each site's usable fuel. At Greenhill, four 100,000 L tanks and the filed 8,252 L/h full-load rate imply 396,096 L for 48 hours. Show usable inventory, operating reserve and auxiliary use, then net MWh and hours of operation at full and expected load with replenishment delayed.

b) Provide aggregate daily fuel requirements and firm supply available to the two sites during Hydro's six-week winter Link scenario, allowing for the dispatch actually expected, other Island thermal demand and weather interruptions. Distinguish contracted quantities and priority from best-efforts supply. Explain how any shortfall changes dependable MW and the economic ranking.

c) Reconcile the operating-hour assumptions across local support, planned work, tests and system calls, including possible overlap. Identify delivery and fuel-conditioning costs, station electricity use and who pays for them. Provide the latest joint fuel assessment or the interim assumption and date for its replacement.

DATED at St. John's, Newfoundland and Labrador, this 24th day of November, 2026.

Per: 

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