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November 24, 2026

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

Attention: Mike McNiven
Senior Regulatory Advisor & Board Secretary

Re: 2027 Wesleyville & Greenhill Thermal Generation Supplemental Application – Requests for Information

Please find enclosed Newfoundland and Labrador Hydro's requests for information NLH-NP-001 to NLH-NP-045 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,

NEWFOUNDLAND AND LABRADOR HYDRO



Shirley A. Walsh
Senior Legal Counsel, Regulatory
SAW/kd

Encl.

ecc:

Board of Commissioners of Public Utilities
Jacqui H. Glynn
Ryan Oake
Colleen Jones
Board General

Island Industrial Customer Group
Dana Constantine, Stewart McKelvey
Denis J. Fleming, Cox & Palmer
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Consumer Advocate
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Justin W. King, O'Dea Earle
Consumer Advocate General

Newfoundland Power Inc.
Dominic J. Foley
Douglas Wright
Regulatory Email

IN THE MATTER OF the *Public Utilities* ("*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.

Newfoundland and Labrador Hydro

Requests for Information

NLH-NP-001 to NLH-NP-045

November 24, 2026

Risk, Quantitative Risk Analysis, and Cost Estimate

NLH-NP-001 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, sec. 9.2 and sec. 9.3, Tables 7–13.**

Please provide a detailed breakdown of the direct, indirect and other costs associated with Wesleyville and Greenhill refurbishment estimates, including associated substation upgrades.

NLH-NP-002 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix E, sec. 5.1, and Appendix D: Monte Carlo Assessment.**

Please provide the risk register, as well as the range of probable outcomes assigned to the risks as used in the Quantitative Risk Analysis.

NLH-NP-003 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix E, Appendix D: Monte Carlo Assessment.**

The Quantitative Risk Analysis ("QRA") includes relatively narrow ranges of potential outcomes for a number of identified risks, suggesting a limited degree of uncertainty in their estimated cost impacts.

a) Please explain the basis for establishing the ranges of potential outcomes assigned to the identified risks, including any historical data, industry benchmarks or expert judgment used.

b) Please explain how Newfoundland Power Inc. assessed the level of confidence in these ranges, particularly given the current stage of project development and associated estimating uncertainties.

c) Please confirm whether broader ranges of potential outcomes were considered and, if so, explain their impact on the QRA results.

NLH-NP-004 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix E, Appendix D: Monte Carlo Assessment; and AACE International Recommended Practice 40R-08.**

a) Please identify the specific Quantitative Risk Analysis ("QRA") methodology employed in developing the contingency estimates for the Wesleyville and Greenhill projects, including the applicable AACE International Recommended Practice(s) relied upon.

b) Please explain the rationale for selecting the methodology, including its suitability given the scope, complexity, estimate maturity and risk characteristics of the proposed projects.

c) Please confirm whether correlations between cost elements or identified risks were considered in the QRA. If so, please describe how these correlations were identified and incorporated into the analysis. If not, please explain why correlations were not considered.

NLH-NP-005 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, sec. 9.1, *Contingency*.**

Given the magnitude and complexity of the proposed projects relative to Newfoundland Power Inc.'s average capital project, has Newfoundland Power Inc. implemented, or does it plan to implement, additional oversight, governance, and control mechanisms (e.g., to control, authorize, and document the use of reserve funds, such as contingency)? If so, please describe.

NLH-NP-006 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, sec. 9.1, *Escalation and Allowance for Funds Used During Construction*; and Appendix E, Appendix C: Basis of Estimate, sec. 7.2 and sec. 7.3.**

Escalation, except for that related to the combustion turbine units, and financing costs (Allowance for Funds Used During Construction) are calculated by Newfoundland Power Inc. The application states the determined value for these elements. Please clarify the rates used and the methodology applied to determine the estimated values for both financing costs (Allowance for Funds Used During Construction) and escalation.

NLH-NP-007 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, sec. 13.0, *Combustion Turbine Procurement*; and Appendix E, Appendix C: Basis of Estimate, sec. 7.2.**

Please explain how escalation was calculated on each scope and how Newfoundland Power Inc. ensured that escalation costs were not duplicated between the scopes.

NLH-NP-008 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, sec. 11.0; and Appendix E, Appendix C: Basis of Estimate, sec. 3.4.2, and sec. 7.5.**

Please describe in detail how costs and schedule delays related to the treatment, containment and proper disposal of ground contamination and hazardous construction materials at the existing plants have been taken into consideration in the Quantitative Risk Analysis.

NLH-NP-009 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, sec. 9.1, *Cost Anchors and Allowances*; and Appendix E, Appendix C: Basis of Estimate, *Executive Summary*.**

a) Please describe what requirements were specified to obtain budgetary pricing for the combustion turbine generators, switchgear, black-start generators, fuel tanks, and other key electrical and mechanical systems, including whether pricing was based on vendor responses to detailed specifications provided by Stantec or in response to a general list of key performance requirements.

b) Please describe how quotation methodology and maturity was quantified in the Quantitative Risk Analysis.

NLH-NP-010 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix E, Appendix C: Basis of Estimate.**

The Basis of Estimate indicates that the project schedule assumes a five-day workweek consisting of ten-hour workdays. Given the locations of the Wesleyville and Greenhill facilities, construction activities may require personnel to travel from outside the immediate project areas.

a) Please identify the assumptions regarding the availability and sourcing of construction labour, including the proportion of the workforce expected to be sourced locally versus from elsewhere in the province or outside the province.

b) Please confirm whether the project cost estimates account for travel, accommodations, living allowances, workforce rotations and other costs associated with employing non-local construction personnel.

c) Did Newfoundland Power Inc. consider alternative work schedules, including rotational arrangements such as ten days on and four days off, in developing the project cost estimates and execution schedules? If not, why not?

d) Please explain how uncertainties associated with construction labour availability, workforce scheduling and associated costs have been considered in the Quantitative Risk Analysis, including any potential impacts on project costs and schedules.

NLH-NP-011 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix C, sec. 6.2, Table 22 and Table 23.**

Newfoundland Power Inc.'s Net Present Value ("NPV") sensitivity analysis considers changes to the scope of the transmission investments associated with Alternative 1 and Alternative 2. However, the analysis does not appear to assess the sensitivity of the NPV results to variations in other key planning and cost assumptions.

a) Please confirm whether Newfoundland Power Inc. conducted NPV and/or reliability sensitivity analyses considering variations in underlying assumptions and risks, including but not limited to combustion turbine generator procurement costs, capital costs, fuel costs, operating costs, load growth, generation capacity requirements, foreign exchange, tariffs, and project in-service dates.

b) If such analyses were conducted, please provide the assumptions and results for each sensitivity.

c) If not, please provide NPV sensitivity analyses assessing reasonable variations in the principal cost and planning assumptions, including the impact on the relative economic ranking of Alternatives 1 and 2.

NLH-NP-012 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, sec. 9.2 and sec. 9.3.**

The project cost estimates include owner's costs of approximately 16% and 12% of the base cost estimates for the Wesleyville and Greenhill facility refurbishments, respectively. These costs are identified as including engineering, project management, internal labour and administration.

a) Please provide a detailed breakdown of the owner's costs for each project, including the amounts allocated to engineering, project management, construction management, internal labour, administration and other activities.

b) Please clarify the division of responsibilities between Newfoundland Power Inc., its engineering consultants and construction contractors for engineering, procurement, project management and construction management activities, and identify where the associated costs are included in the project estimates.

c) Please explain the basis for determining the owner's cost allowances for each project, including any benchmarks, historical project experience or other supporting information used to assess their adequacy.

NLH-NP-013 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, sec. 9.1, *Cost Anchors and Allowances*; and sec. 13.0, *Combustion Turbine Procurement*.**

a) Please provide the dates on which budgetary quotations for the proposed combustion turbine units at Wesleyville and Greenhill were obtained, including the equipment configurations associated with each quotation.

b) Please confirm whether the quotations remain valid and whether Newfoundland Power Inc. has obtained any updated pricing since the preparation of the project cost estimates. If updated pricing is available, please provide the revised quotations and identify any material changes from the amounts included in the application.

NLH-NP-014 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix E.**

Newfoundland Power Inc.'s project cost estimates include contingency allowances established at the P90 confidence level based on the results of the Quantitative Risk Analysis.

a) Please explain the rationale for selecting the P90 confidence level for establishing project contingency, including the consideration given to alternative confidence levels, such as P50.

b) Please explain how the contingency allowances distinguish between estimating uncertainty, identified project risks, and any other risk provisions or management reserves.

NLH-NP-015 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix E, Appendix C: Basis of Estimate, sec. 4, Table 4.**

a) The included maturity matrix includes a number of items that are assessed as not quite being at a Class 3 maturity level, which may lead to the estimate best being classed as a Class 3 with conditions. How has Newfoundland Power Inc. accounted for items that are classed higher than Class 3 within its Quantitative Risk Analysis?

b) Have any of the items classified as higher than Class 3 been further matured since the completion of the maturity matrix? If so, please provide the revised classifications.

NLH-NP-016 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, sec. 9.1, and Appendix D, sec. 6.1.1 and sec. 6.2.1.**

The Generation Technology Assessment indicates that its capital cost estimates were developed assuming an Engineering, Procurement and Construction ("EPC") contracting approach.

a) Please describe Newfoundland Power Inc.'s anticipated contracting strategy for the Wesleyville and Greenhill refurbishment projects, including whether an EPC, Engineering, Procurement and Construction Management, or alternative contracting approach is contemplated.

b) Please explain the rationale for the proposed contracting strategy, including any consideration given to alternative approaches and the anticipated allocation of responsibilities between Newfoundland Power Inc., engineering consultants, equipment suppliers and construction contractors.

c) Please confirm whether the project cost estimates and Quantitative Risk Analysis have been developed consistently with the anticipated contracting strategy, including the allocation of costs and risks associated with engineering, procurement, construction management, contractor interfaces and project execution.

NLH-NP-017 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix D.**

Has Newfoundland Power Inc. considered the grey market (refurbished or previously owned units) for sourcing a combustion turbine generator package? If not, why not?

NLH-NP-018 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix C, sec. 6.2, Table 22 and Table 23.**

Newfoundland Power Inc.'s base Net Present Value ("NPV") analysis identifies Alternative 1 as the least-cost option by approximately $76.3 million. Under the revised analysis that includes additional Sunnyside transformation under Alternative 1 and excludes the Gambo–Wesleyville transmission line under Alternative 2, the difference decreases to approximately $23.8 million.

a) Please provide the NPV impact of each of these two changes independently, as well as their combined impact.

b) Please identify the replacement generation capital cost, expressed in $/kW, at which Alternative 2 would become the least-cost option under both the base analysis and the revised sensitivity analysis.

c) Please identify any other material assumptions for which reasonably foreseeable variations could change the relative economic ranking of the alternatives.

Local Reliability

NLH-NP-019 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix C, Table 15.**

Please identify the number of delivery points monitored that were used to calculate T-SAIFI and T-SAIDI and confirm the formula used for each calculation.

NLH-NP-020 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix C, Table 15.**

Please provide the average interruption duration and average interruption frequency for each of the Hare Bay, Trinity, Greenspond, and Wesleyville systems for the period of 2011–2020, and for the period of 2021–2025. Please provide an adjusted average

interruption duration and average interruption frequency assuming the Wesleyville combustion turbine generator was unavailable.

NLH-NP-021 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix C, Table 16.**

a) Please provide a comparison of the T-SAIDI and T-SAIFI values presented in Table 16 against comparable industry benchmarks.

b) Please provide Newfoundland Power Inc.'s T-SAIDI and T-SAIFI targets, and explain how such targets are established, including whether Newfoundland and Labrador Hydro's T-SAIDI and T-SAIFI statistics are considered.

NLH-NP-022 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix C, Table 16.**

Please provide the calculations of T-SAIDI and T-SAIFI for 115L/116L and Wesleyville.

NLH-NP-023 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix C, p. 25.**

According to the second paragraph on page 25, reliability in the Gambo-Wesleyville area declined in recent years due to the unavailability of the Wesleyville Combustion Turbine Generator. Please provide a list of outages for which the Wesleyville Combustion Turbine Generator was unavailable and explain how the duration and customer impact of each outage would differ if the Wesleyville Combustion Turbine Generator was available.

NLH-NP-024 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix C, p. 27, last sentence and footnote 61.**

a) Please provide details on how the outage statistics were normalized on an annual basis.

b) At what percentage capacity did Wesleyville and Greenhill operate during planned outages? Were the facilities able to supply load reliably to all customers during these periods, or only to a portion of customers?

NLH-NP-025 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, sec. 3.0 and sec. 10.0.**

a) Please provide Newfoundland Power Inc.'s assessment of the expected availability and reliability of the existing facilities during the proposed project execution period.

b) Please identify any sustaining capital expenditures, major maintenance or temporary operating measures anticipated to maintain the existing facilities in service until the replacement generation is commissioned

c) Please explain the contingency plans that would be implemented if either existing facility becomes permanently unavailable before the proposed refurbishment is completed.

NLH-NP-026 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix C, sec. 5.1, sec. 5.2, and sec. 6.2.**

The Planning Study identifies local reliability benefits associated with maintaining generation at Wesleyville and Greenhill. The revised net present value sensitivity also considers excluding the proposed Gambo–Wesleyville transmission line from Alternative 2, thereby accepting a reduction in local reliability.

a) Please quantify the expected incremental improvement in customer reliability associated with each proposed refurbishment relative to retirement of the existing generation without replacement at the same site, considering the other system investments identified in the Planning Study.

b) Please identify the reliability criteria or service standards used to determine the minimum acceptable level of local reliability under each alternative.

System Reliability

NLH-NP-027 **Reference: *Electrical Power Control Act, 1994*, subsections 14.1(2), 14.1(3), and 14.1(5); Wesleyville and Greenhill Thermal Facility Refurbishments Report, sec. 8.1 and sec. 8.2.**

Newfoundland Power Inc. has stated:

> The ordinary meaning of the word refurbishment includes modernizations and upgrades that do not alter the essential character of the facilities. In the context of utility regulation, the Board's approval of capital refurbishment projects often includes the uprating of certain

> equipment in facilities such as hydro plants and substations. This approach is consistent with a liberal interpretation and construal of the Public Utilities Act and the EPCA.[1]

and within this application state:

> …retirement and removal of the existing combustion turbine generating equipment and the installation of new combustion turbine generation and associated balance-of-plant, building, electrical, protection, control, and substation assets at the existing sites.

Please explain the basis for characterizing the proposed projects as refurbishments, having regard to the retirement of the existing generating units, replacement of balance-of-plant systems and construction of new facilities, and the significant increase in generating capacity.

NLH-NP-028 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix C, sec. 3.0, sec. 4.0, sec. 5.0, and sec. 6.1.**

The Planning Study identifies local reliability support, regional transmission-system support and firm generation capacity on the Island Interconnected System as principal functions provided by the Wesleyville and Greenhill facilities.

a) For each facility separately, please identify the specific regional reliability and transmission-system requirements that the proposed refurbishment is intended to address, including local supply reliability, voltage and reactive-power support, and transmission capacity constraints.

b) Please identify the minimum generating capacity and associated technical capabilities required at each location to satisfy the requirements identified in part a), independently of broader Island Interconnected System generation capacity requirements.

c) Please explain the extent to which the proposed generating capacity at each location is justified by regional reliability and transmission-system requirements versus the need for additional firm generating capacity on the broader Island Interconnected System.

[1] Newfoundland Power Inc.'s response to CA-NP-015 of Newfoundland Power Inc.'s 2027 Capital Budget Application proceeding.

d) Please confirm whether the proposed generating capacity and configuration at each location would remain justified in the absence of a broader Island Interconnected System generation capacity requirement and explain the basis for the response.

NLH-NP-029 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix C, sec. 5.0, Table 19, and sec. 6.1, Table 20.**

The Planning Study identifies alternative investments to address regional reliability and transmission-system requirements following retirement of the Wesleyville and Greenhill generating facilities. Alternative 2 includes a new transmission line between Gambo and Wesleyville to maintain local reliability, while the proposed upgrades at Monkstown and Bay L'Argent principally address transmission voltage-support requirements on the Burin Peninsula.

a) For the Wesleyville and Greenhill regions separately, please identify the least-cost alternative investments required to satisfy regional reliability and transmission-system requirements following retirement of the existing generating facilities, assuming no replacement generation is installed at either location. The assessment should include local supply reliability, voltage and reactive-power support, and transmission capacity requirements, but exclude investments required solely to replace firm generating capacity on the broader Island Interconnected System.

b) Please provide the estimated capital costs and net present value of the investments identified in part a), separately for each region, including a breakdown of individual investments and associated costs. Where investments provide benefits to both regions, please identify these costs separately and explain their treatment in the analysis.

c) Please confirm whether the investments identified in part a) would satisfy the same regional reliability and transmission-system planning criteria as the proposed refurbishments. If not, please identify any differences in the level of reliability or system performance provided.

d) With specific reference to Greenhill, please explain whether Alternative 2 fully addresses the regional reliability and transmission-system requirements currently served by the existing facility. If so, please identify the incremental regional reliability

benefits, if any, associated with the proposed Greenhill refurbishment relative to Alternative 2.

NLH-NP-030 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix C, sec. 6.1.**

The Planning Study identifies local reliability support, regional transmission-system support and firm generation capacity on the Island Interconnected System (IIS) as principal functions provided by the Wesleyville and Greenhill facilities.

a) Please explain the basis for assuming that retirement of the existing Wesleyville and Greenhill facilities, without replacement generation at those locations, would require the installation of an equivalent 45.6 MW of new generating capacity elsewhere on the Island Interconnected System, particularly given that the existing facilities provide approximately 28 MW of combined derated capacity.

b) Please explain whether Newfoundland Power Inc. assessed the extent to which retirement of the existing Wesleyville and Greenhill facilities could alter the type, size or timing of future generation resources required on the Island Interconnected System, as compared to the resource additions contemplated through Newfoundland and Labrador Hydro's *Reliability and Resource Adequacy Study Review* proceeding.

c) Please explain whether Newfoundland Power Inc. considered that the incremental generation capacity and costs associated with alternative resource portfolios may differ from those assumed for the direct replacement of the proposed Wesleyville and Greenhill generating capacity, including circumstances where the retirement of these facilities may alter the timing or sizing of other planned generation additions rather than necessitating a separate equivalent-capacity investment.

NLH-NP-031 **Reference: Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix C.**

The proposed Wesleyville and Greenhill projects involve the retirement and replacement of the existing combustion turbine generating units and associated infrastructure, with an increase in combined firm generating capacity of approximately 17 MW.

Please confirm whether Newfoundland Power Inc.'s Planning Study considered the optimal timing and quantity of replacement capacity within Hydro's broader generation

expansion plan, as opposed to assuming that an equivalent quantity of capacity must be installed elsewhere in 2031 under Alternative 2.

NLH-NP-032 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix C, sec. 6.1.**

a) Please confirm whether Newfoundland Power Inc. evaluated the refurbishment or retirement of Wesleyville and Greenhill independently.

b) If so, please provide the estimated capital costs, lifecycle costs and net present values of alternatives involving the refurbishment of one facility and retirement of the other.

c) If not, please explain why these combinations were not evaluated, given the differing local reliability and transmission-system support functions provided by the two facilities.

NLH-NP-033 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix D, sec. 8.2.**

Please confirm whether Newfoundland Power Inc. considered alternatives that separate the requirements for firm, sustained generation from those for local reliability and reactive-power support, including combinations of smaller combustion turbines, energy storage, reactive-power compensation, frequency support, and transmission upgrades. If such alternatives were considered, please provide the results. If not, please explain why they were excluded.

Schedule

NLH-NP-034 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix E, sec. 7.**

Has Newfoundland Power Inc. developed a Basis of Schedule document for the proposed projects? If so, please provide. If not, please explain why.

NLH-NP-035 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix E, sec. 7.**

The project schedules appear to contemplate sequential commissioning of the Wesleyville and Greenhill facilities, with construction activities based on a five-day workweek.

a) Please confirm whether Newfoundland Power Inc. intends to procure combustion turbine units from a common supplier for both facilities and whether the project schedules and cost estimates reflect any anticipated efficiencies associated with common procurement and sequential commissioning.

b) Please confirm whether the project cost estimates and schedules account for the anticipated availability and requirements of equipment supplier representatives, commissioning specialists, Newfoundland Power Inc. personnel and construction contractors during commissioning, including any additional costs associated with extended working hours or overlapping resource requirements between the two projects.

NLH-NP-036 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix E, sec. 7.**

Has any contingency or time risk reserve been applied to the schedule? If so, how have the escalation and financing costs been applied to such reserves?

NLH-NP-037 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, sec. 9.1, sec. 10.0, and sec. 11.1.**

a) Please describe the expected timeline for filing the Environmental Assessment and Newfoundland Power Inc.'s assumed timeline for approval of the Environmental Assessment.

b) Please describe how Newfoundland Power Inc. has considered potential cost implications related to modifications in scope that may arise from the Environmental Assessment.

NLH-NP-038 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix C, sec. 4.5, sec. 6.2, Table 21.**

a) Please explain the basis for assuming that all 89 MW of potential industrial load additions will materialize prior to 2032, including the level of certainty associated with the proposed loads and their anticipated in-service dates.

b) Please identify which transmission-system constraints and associated investments are required under the base load forecast and which arise specifically from the assumed 89 MW of additional industrial load.

c) Did Newfoundland Power Inc. complete a sensitivity analysis for a low-growth scenario? If so, please provide. If not, why not?

Technical

NLH-NP-039 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report.**

Please indicate whether the fuel tanks will be erected on site or fabricated off-site and installed.

NLH-NP-040 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report.**

a) Please identify Newfoundland Power Inc.'s current fuel provider for these facilities.

b) Please provide the number of fuel deliveries and volume of fuel delivered by facility, by month, over the past five years.

NLH-NP-041 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, sec. 13.0.**

a) Please provide Newfoundland Power Inc.'s assumptions regarding fuel requirements during a prolonged six-week Labrador-Island Link outage.

b) Assuming adequate availability of diesel fuel on the Island, please describe Newfoundland Power Inc.'s logistics plan for fuel delivery during a prolonged outage whereby the proposed combustion turbine generators are called upon to supply the Island Interconnected System, including how fuel logistics will be managed with limited on-site fuel storage?

NLH-NP-042 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix D.**

Please describe how changes in combustion turbine generator technology selection compared to that assumed in the project estimate could impact the project estimate.

NLH-NP-043 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix D, sec. 7.3, Table 7-3.**

a) Please confirm whether Best Available Control Technology ("BACT") is a requirement for the proposed combustion turbine generators.

b) Please confirm whether Dry Low Emissions constitutes BACT in this context. If it does not, please provide the control technology that constitutes BACT for the proposed facilities.

NLH-NP-044 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix C, p. 37.**

a) Did Newfoundland Power Inc. assess the installation of alternative reactive power support to mitigate the voltage impacts associated with the loss of 137L, thereby avoiding the need for the combustion turbines to operate in generating mode for voltage support when system load exceeds 94%?

b) Did Newfoundland Power Inc. evaluate whether the incremental cost of additional shunt capacitor installations or alternative reactive power support would be a more cost-effective long-term solution versus the additional fuel cost in the event that load growth increases the requirement for operation in generating mode for voltage support?

c) Does Newfoundland Power Inc. expect to have additional operational costs when the combustion turbine generator is utilized solely for voltage support, compared to other reactive power supports?

Asset History

NLH-NP-045 **Reference: Wesleyville and Greenhill Thermal Facility Refurbishments Report, Appendix A; and Appendix B, Table B-1 and B-2.**

a) Please explain whether Newfoundland Power Inc. considers the historical capital investment in the Wesleyville and Greenhill facilities over the 2006–2025 period to have been adequate to maintain their condition, reliability and expected service lives, and provide the basis for this assessment.

b) Please explain whether a more proactive sustaining capital investment or asset renewal program over this period could reasonably have extended the service lives of the existing facilities or deferred the need for the proposed refurbishments.

c) If so, please identify the major investments that could have been undertaken, their estimated costs, and the extent to which they could have extended the service lives of the facilities.

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



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