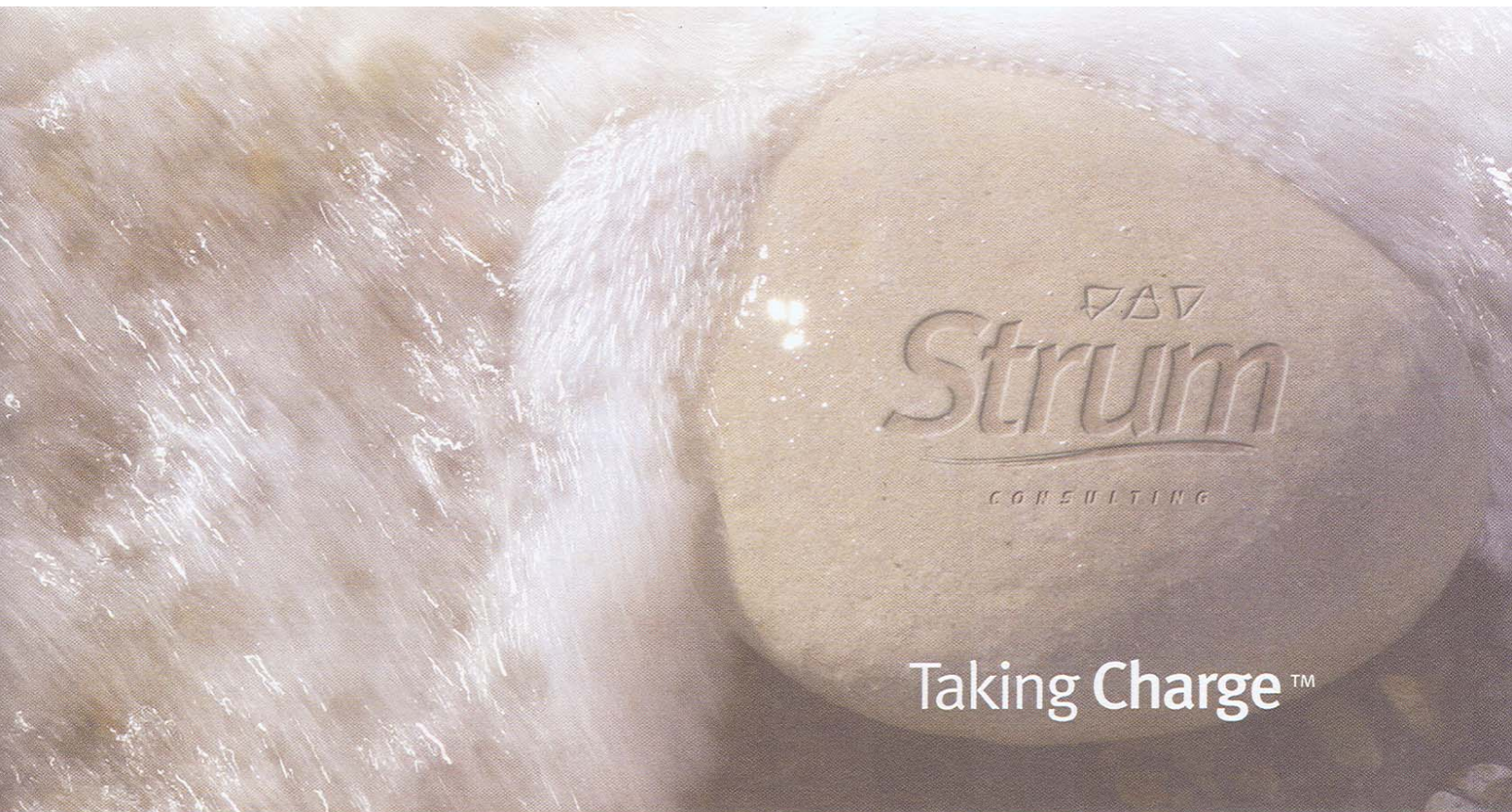




**ENVIRONMENTAL ASSESSMENT
REGISTRATION DOCUMENT
101L/102L Transmission Line Decommissioning Project**

*****AUW **\$, 2022**



Taking Charge™

EXECUTIVE SUMMARY

Newfoundland Power is proposing to decommission a 70 km section of the 101L and 102L Transmission Lines between Grand Falls-Windsor and Glenwood, Newfoundland (the Project). These two sections of the transmission line are no longer required as Newfoundland Power has reconfigured the grid system, replacing these lines with a newly constructed 138 kV transmission line. Project activities include the dismantling, removal, and disposal of 32.5 km of the 101L transmission line along with the dismantling, removal, and disposal of 37.5 km of the 102L transmission line.

The Project crosses or passes within the 200 m buffer of several watercourses that are scheduled salmon rivers under the *Fisheries Act*. Additionally, sections of the Project passes within the vicinity of T'railway Provincial Park, Notre Dame Provincial Park, Corduroy Brook Nature Reserve, Fallsview Municipal Park, and Indian Arm Brook Water Supply Area. An assessment of the sources of pollution and environmental impacts from the Project on the environment was completed. With the implementation of various mitigation measures, the Project is not expected to have any significant impacts on the key environmental features described herein.

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1.0 INTRODUCTION

Newfoundland Power (the Proponent) is proposing to decommission 32.5 km of the 101L Transmission Line along with 37.5 km of the 102L Transmission Line between Grand Falls-Windsor and Glenwood, Newfoundland (NL). These sections of the transmission line are no longer required as Newfoundland Power has reconfigured the central Newfoundland grid system, replacing these lines with a newly constructed 138 kV transmission line.

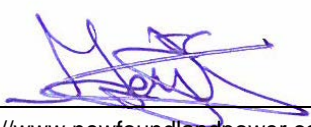
The Project site is located within 200 m of several scheduled salmon rivers listed under the *Fisheries Act*, and therefore, requires registration under Section 28 of the *Environmental Assessment Regulations, 2003*.

1.1 Proponent Information

Newfoundland Power operates an integrated electricity generation, transmission, and distribution system throughout the island portion of Newfoundland and Labrador. As the primary distributor of electricity on the island, they operate 12,850 km of transmission and distribution lines on the island, providing service to over 271,000 customers.

Proponent and consultant contact information is provided in Table 1.1.

Table 1.1. Proponent Information

PROPONENT	
Name	Newfoundland Power Inc.
Address	55 Kenmount Road, PO Box 8910 St. John's, NL A1B 4P2
CEO	Gary Murray, President and CEO
Signature	
Website	https://www.newfoundlandpower.com
PRINCIPAL PROPONENT CONTACT	
Name	Adam Scott
Official Title	Professional Engineer (P. Eng.) Civil, T&D Engineering
Address	55 Kenmount Road, PO Box 8910 St. John's, NL A1B 4P2
Telephone	(709) 699-1317
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ENVIRONMENTAL CONSULTANT CONTACT		
Name	Shawn Duncan	Natasha Myers
Title	President	Senior Environmental Scientist
Address	#E120 – 120 Torbay Road St. John's, Newfoundland A1A 2G8	#E120 – 120 Torbay Road St. John's, Newfoundland A1A 2G8
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Fax	(902) 835-5574	(902) 835-5574
Email	sduncan@strum.com	nmyers@strum.com

1.2 The Undertaking

Name of the Undertaking: 101L/102L Transmission Line Decommissioning Project
Location of the Undertaking: Grand Falls-Windsor to Glenwood, Newfoundland

1.3 Description of the Undertaking

Newfoundland Power is proposing to decommission the entire 32.5 km length of Transmission Line 101L along with a 37.5 km section of Transmission Line 102L (the Project). Transmission Line 101L is a 66 kV single pole line running between the Grand Falls substation and the Rattling Brook Substation located in central Newfoundland. Transmission Line 102L is also a 66 kV single pole line; the section of this line to be removed runs between the Rattling Brook substation and the Roycefield substation. The total length of transmission line to be decommissioned as part of this Project is 70 km (Drawing 1, Appendix A).

Newfoundland Power has undergone reconfiguration of the central Newfoundland grid system which involved the construction of a new 138 kV transmission line to replace the existing 101L and 102L lines that are proposed to be decommissioned. The 101L and 102L Transmission Lines will be decommissioned sequentially, starting in mid-April. Decommissioning activities will involve the dismantling, removal, and disposal of all components of the (32.5 km length) 101L and (37.5 km length) 102L transmission lines. This includes the poles, anchors, insulators, guys, conductor, and other associated hardware. All of the components are to be properly disposed of by the contractors, except for the insulators and conductors which are to be returned to Newfoundland Power.

There are several Salmon River crossings along the Project route that are within the 200 m buffer around scheduled salmon rivers.

2.0 PROJECT DESCRIPTION

2.1 Project Location

The Project will be completed on the entire 32.5 km length of Transmission Line 101L along with a 37.5 km section of Transmission Line 102L, located in central Newfoundland (Drawing 1, Appendix A). The Project spans between the communities of Grand Falls-Windsor and Glenwood, NL.

2.2 Physical Features

2.2.1 Key Environment Features

Newfoundland is part of the Boreal Shield Ecozone which covers much of Canada. Boreal forests are characterized by stands of Black spruce (*Picea mariana*), White spruce (*Picea glauca*), Jack pine (*Pinus banksiana*), and Balsam fir (*Abies balsamea*) mixed with bogs and other wetlands. As a result of glacial scouring, areas of bare rocky outcrops support lichen and low shrubs.

The Project is located within the Central Newfoundland Ecoregion of the Boreal Shield Ecozone. Its forests are dominated by closed, intermediate to low stands of Balsam fir and Black spruce on steep, moist, upland slopes. White birch (*Betula papyrifera*), aspen (*Populus* sp.), and Black spruce are typical of disturbed sites and exposed nutrient poor sites are characterized by Black spruce, ericaceous shrubs, such as Lambkill (*Kalmia angustifolia*), Labrador tea (*Rhododendron groenlandicum*), and lichens. Open stands of dwarfed Black spruce and Eastern larch (*Larix laricina*) with ericaceous shrubs are found on raised dome bogs.

The Project is located primarily in developed/disturbed habitat, running parallel to existing road networks (primarily the Trans Canada Highway) and passing through multiple communities including Grand Falls-Windsor, Bishop's Falls, and Norris Arm. There are a number of watercourses and expansive wetlands in proximity to the transmission lines. Wetlands in the area consist primarily of open bogs and fens, with treed swamps and riparian floodplains, dominated by Black spruce, ericaceous shrubs, and herbaceous species that thrive in nutrient poor and acidic conditions. Substrates in the bogs are comprised of deep accumulations of peat, which are deepest in the center of bogs and shallower around granite outcroppings and wetland edges.

The landscape in the Project area is punctuated by numerous watercourses, waterbodies, and wetland habitats. The Project is within proximity and/or crosses several scheduled salmon rivers associated with the Exploits River and tributaries, Rattling Brook, and tributaries of Gander River (see Section 2.2.1.1).

For species designated as rare or at risk, individual species and/or their dwellings are provided protection provincially, under the Newfoundland and Labrador *Endangered Species Act* (NL ESA) and federally, under the *Species at Risk Act* (SARA). Throughout this report, Species of Conservation Interest (SOCI) will be defined as follows:

- Species listed under SARA as “Endangered”, “Threatened”, or “Special Concern” (Government of Canada, 2021);

- Species listed under COSEWIC as “Endangered”, “Threatened”, or “Special Concern” (Government of Canada, 2021);
- Species listed under NL *ESA* as “Endangered”, “Threatened” or “Vulnerable” (NSE, 2021); or
- Species having a subnational (provincial) rank (S-Rank) of “S1”, “S2”, or “S3” (ACDC, 2021).

The Atlantic Canada Conservation Data Centre (ACDC) has observation records for two flora species of conservational interest (SOI) within 5 km of the Project area (ACDC, 2022). These species are listed in Table 2.1.

Table 2.1. Flora Species of Conservational Interest within 5 km of the Project

Common Name	Scientific Name	SARA ¹	COSEWIC ²	NL <i>ESA</i> ³	General Status ⁴	S-Rank ⁵
Longstalk sedge	<i>Carex pedunculata</i>	Not Listed	Not Listed	Not Listed	G5	S3
A sedge	<i>Carex houghtoniana</i>	Not Listed	Not Listed	Not Listed	G5	S1

Source: ACDC, 2022

¹*Species at Risk Act*

²Committee on the Status of Endangered Wildlife in Canada

³Newfoundland and Labrador Endangered Species Act

⁴Provincial General Status

⁵Subnational Rarity Rankings

There were no observations of fauna SOI recorded within 5 km of the Project area, however, based on Expert Opinion Maps provided by ACDC, the following are considered “Possible” in the general area:

- Banded killifish (*Fundulus diaphanus*): “Vulnerable” (NL *ESA*);
- Ivory Gull (*Pagophila eburnea*): “Endangered” (COSEWIC, SARA, and NL *ESA*);
- Rusty Blackbird (*Euphagus carolinus*): “Special Concern” (COSEWIC and SARA), “Vulnerable” (NL *ESA*); and
- Red Crossbill (*Loxia curvirostra percna*): “Threatened” (COSEWIC and SARA), “Endangered” (NL *ESA*).

In addition, the following were listed as “Possible, but Unlikely” to occur in the general Project area:

- Boreal felt lichen (*Erioderma pedicellatum*): “Special Concern” (COSEWIC and SARA), “Vulnerable” (NL *ESA*);
- Polar bear (*Ursus maritimus*): “Special Concern” (COSEWIC and SARA), “Vulnerable” (NL *ESA*);
- American marten – NL pop (*Martes americana atrata*): “Threatened” (COSEWIC, SARA, and NL *ESA*); and
- Short-eared Owl (*Asio flammeus*): “Special Concern” (SARA), “Threatened” (COSEWIC), and “Vulnerable” (NL *ESA*).

ACCDC data also identified that the Project area is said to be within the range of the Barrow's Goldeneye (*Bucephala islandica*) which is listed as "Vulnerable" under the NL ESA.

2.2.1.1 Scheduled Waters Within 200 metres of Project Site

The proposed Project crosses and passes within 200 m of the following scheduled salmon bearing rivers (Schedule 1, *Newfoundland and Labrador Fishery Regulations SOR/78-443*) (Drawing 2, Appendix A):

- Exploits River & Tributaries (crosses at 12 locations)
- Rattling Brook (crosses at two locations)
- Gander River & Tributaries (crosses at seven locations)

Exploits River is Newfoundland's longest river, spanning approximately 246 km with a catchment area of 11,000 km² (DFO, 2001). The headwaters of Exploits River are located at Red Indian Lake, flowing northeast, and discharging into the Bay of Exploits. The Exploits River provides suitable spawning habitat for Atlantic salmon (*Salmo salar*) but has been subject to significant anthropogenic disturbances, primarily hydroelectricity generation. As a result of anthropogenic and natural barriers, at one time less than 10% of the watershed was accessible to Atlantic salmon, leading to population declines.

The Exploits River has seen a significant recovery of the Atlantic salmon population since the installation of fish ladders which have allowed salmon to utilize habitat and spawning areas that were previously inaccessible due to hydroelectric infrastructure (DFO, 2001). Sections of the Exploits River are now open to salmon fishing which is managed (Zone 4) and regulated by Fisheries and Oceans Canada (DFO) (DFO, 2021). The Project runs parallel to the Exploits River for approximately 40 km, crossing the river alongside the Trans Canada Highway in Bishop's Falls, NL. The Project also crosses a number of the Exploits River & Tributaries; a total of 12 crossings were identified during the desktop review along the 101L (seven) and 102L (five) Transmission Lines.

Rattling Brook, located near Norris Arm, has a watershed of approximately 384 km² with headwaters originating at Rattling Brook Big Pond, discharging into the Exploits River (Atlantic Salmon Federation, 2020). In the 1950s, a hydroelectric dam was constructed along this brook completely blocking fish passage and use of this watershed. Through the installation of fish ladders and recovery programs, Atlantic salmon populations in Rattling Brook have significantly increased (Atlantic Salmon Federation, 2020). Currently, Rattling Brook is closed to salmon fishing and according to the DFO website, special management practices may apply (DFO, 2021). The Project crosses Rattling Brook twice near the Rattling Brook Substation.

Gander River is approximately 175 km long with an expansive drainage basin around 6,400 km² (The Canadian Encyclopedia, 2014). This river has a southwest and northeast portion that merge with the main river at Gander Lake, which flows northeast and discharges into the Atlantic Ocean at Gander Bay. The Gander River is a popular location for salmon fishing, with a number of recreational facilities and lodges in the area. The Project footprint crosses the Gander River & Tributaries at seven locations all along the 102L Transmission Line.

The location and number of crossings for the scheduled salmon rivers (i.e., Exploits River & Tributaries and Rattling Brook) listed above are based on aerial imagery and desktop surveys alone. Additional scheduled watercourse or tributary crossings may exist within the Project's footprint that were not identified during this desktop review; therefore, the location and number of crossings will need to be ground-verified prior to decommissioning activities proceeding.

2.2.1.2 Indian Arm Brook Water Supply Area

The Project, approximately a 10 km section of the 102L Transmission Line, passes through the Indian Arm Brook Water Supply Area (also known as Campbellton). This water supply area is provincially protected and regulated under the Water Resources Act (2002) (Drawing 2-2, Appendix A).

2.2.1.3 T'railway Provincial Park

The Project is within proximity to and crosses the Newfoundland T'railway Provincial Park at several locations along the 101L and 102L Transmission Lines. The T'railway is a recreational trail along the former Canadian National Railway line, spanning 883 km between St. John's and Port aux Basques, NL. This multi-use trail supports a variety of recreational activities including hiking, angling, horseback riding, snowmobiling, and cross-country skiing, and ATV use. The Project crosses the T'railway at four separate locations (the 101L and 102L lines each cross the trail twice).

2.2.1.4 Notre Dame Provincial Park

The Project, specifically the 102L Transmission Line, is located within proximity of the Notre Dame Provincial Park. The Notre Dame Provincial Park is approximately 110 ha in size, located along the Trans Canada Highway between Norris Arm and Glenwood, NL. This park is situated on Junction Pond, and supports a variety of activities including camping, angling, bird watching, cycling, canoeing, swimming, and other recreational activities. There is an approximate 1.5 km stretch of the Project that is within 200 m of the Provincial Park's boundaries.

2.2.1.5 Corduroy Brook Nature Reserve

The Project, specifically the 101L Transmission Line, is located within proximity of the Corduroy Brook Nature Reserve. Corduroy Brook Nature Reserve is approximately 200 ha in size, containing a collection of ponds, wetlands, walking trails, and boardwalks located in Grand Falls-Windsor along the Corduroy Brook. The nature reserve is open year-round, and is a popular location for bird watching, hiking, camping, along with other recreational opportunities. There is an approximate 800 m stretch of the Project that is within 200 m of the Nature Reserves boundaries.

2.2.1.6 Fallsview Municipal Park

The Project, specifically the 101L Transmission Line, is within proximity of the Fallsview Municipal Park located in the community of Bishop's Falls. This municipal park is situated along the Exploits River, offering popular camping and salmon angling opportunities. There is an approximate 500 m stretch of the Project that is within approximately 400 m of the municipal park boundaries.

2.3 Decommissioning

Decommissioning the 101L and 102L Transmission lines will consist of the following components:

- **Dismantling:** The conductor wires, insulators, guys, and all other hardware will be removed from the transmission lines through the use of heavy equipment.
- **Removal:** Support structures (i.e., poles, anchors, and concrete pilings) will be removed completely or cut at the bottom and left in place. The decision to leave infrastructure in place will be site specific, with future land use and safety taken into account. Following the removal of support structures, all holes will be backfilled with appropriate fill and cover material.
- **Disposal:** All of the transmission line components are to be properly disposed of by the contractor, with the exception of the insulators and conductors which are to be returned to Newfoundland Power.

Decommissioning activities will primarily be completed by contractors, with Newfoundland Power crews assisting with distribution crossings and substation connections. A Newfoundland Power site representative will be available, but will not be present on site during all Contractor decommissioning activities.

2.3.1 Potential Sources of Pollution

Potential sources of pollutants into environmental features that may result from decommissioning activities include:

- Sedimentation and siltation from soil disturbance;
- Sedimentation and siltation in small watercourses due to fording;
- Accidental spills from equipment; and
- Disturbance of wildlife and vegetation.

Decommissioning activities will involve the dismantling and removal of transmission line components within the 200 m buffer of the identified watercourses which may cause sedimentation and siltation into the scheduled salmon rivers, negatively impacting water quality. Accidental release of deleterious substances, including fuel and lubricants, from machinery may also negatively impact water quality.

Sections of scheduled salmon rivers and associated tributaries may need to be forded during the Project. Fording, may result in alteration to the watercourse substrate as well as the release of fine sediments from the substrate and shoreline which may negatively impact water quality.

Decommissioning activities may also disrupt wildlife within the vicinity of the transmission lines. Disruption may occur as a result of noise and activity associated with equipment, machinery, and personnel. Newfoundland Power has operating procedures in place to guide employees if wildlife is encountered on the job site (OPR600.04 – Wildlife). Any required vegetative management during migratory bird season will be completed in accordance with Newfoundland Power's migratory bird operating procedure (OPR200.38 – Migratory Birds).

Newfoundland Power will implement a project specific Environmental Protection Plan (EPP) prior to decommissioning activities, including an erosion and sedimentation control plan (ESCP), wildlife management plan, fish and fish habitat protection plan, noise management plan, air quality management plan, spill prevention plan, and contingency plan (as necessary). Following the completion of decommissioning activities, the areas adversely affected by this Project must be restored to a state that resembles natural conditions. Additionally, the environmental management measures outlined in Section 2.3.2 will be implemented to minimize the risk of release of sediment.

2.3.2 Environmental Management Measures

Mitigative measures to minimize the environmental effects of the Project include:

- Implementation of the EPP, including the ESCP, spill prevention plan, and contingency plans (as necessary prior to Project activities);
- ESC structures will be maintained and inspected regularly with particular emphasis before and after forecasted heavy rain events, and with consideration of the timing and types of activities involved;
- Where necessary, ESC measures will remain in place after work is completed until areas have stabilized and natural re-vegetation occurs;
- Exposed soils and stockpiles capable of producing sediment laden-runoff will be stabilized and/or covered;
- A complete oil spill clean-up kit must be on the site at all times when gasoline or fuel powered equipment is being used or refuelled;
- Refuelling will not be completed within 30 m of a watercourse or waterbody edge;
- Disturbed soils will be re-vegetated after Project activities are completed;
- Stream banks at fording sites that contain loose or erodible material must be adequately stabilized before crossing to minimize siltation of the stream;
- Fording will be carried out during periods of low water levels;
- The natural course of the stream will not be altered during fording;
- Fording site will be located at shallow sections of channels where there are low approach grades and the channel consists of stable substrate;
- The fording sites will be restored to their original condition once decommissioning activities are complete; and
- Refer to NL ECC *Chapter 10: Environmental Guidelines for General Construction Practices* (2018).

2.4 Local Receptors

The Project runs through several communities and near existing infrastructure such as the Trans-Canada Highway along with the Grand Falls-Windsor, Bishop's Falls, and Rattling Brook substations. The nearest communities to the Project are Grand Falls-Windsor, Bishop's Falls, Norris Arm, and Glenwood, where the nearest residential properties are located within 100 m of the Project. The Project is located in proximity to two Provincial Parks, one Nature Reserve, and passes through several watercourses that are used for recreational purposes, particularly fishing.

Decommissioning activities have the potential to cause minor disturbances to nearby residences and recreational users through the creation of noise and dust from equipment, as well as increased traffic on nearby roads. Newfoundland Power has operating procedures in place to guide employees and contractors with respect to limiting disturbance from vehicular disruptions (OPR112.14 – Traffic Control) and environmental alteration (OPR101.24 – Vegetation Management). In addition, Newfoundland Power will minimize the impact of Project activities on local receptors through the implementation of the following mitigation measures:

- Implementing a Project specific EPP, including detailed identification of impacts to receptors and management plans for noise and air quality;
- Decommissioning activities will be completed during regular daylight working hours;
- Vehicular traffic coming to and from the site will be kept at a required minimum;
- Equipment will be maintained in good working order and properly muffled in accordance with accepted industry practices and operating procedures; and
- Idling of equipment and vehicles will be minimized.

2.5 Occupations

It is anticipated that approximately 30 staff members will be involved in the Project, involving the following occupations (with NOC code breakdown) from both Newfoundland Power and Contractor staff:

- Engineering Technicians:
 - 2212 Geological and Mineral Technologists and Technicians
 - 2231 Civil Engineering Technologists and Technicians
 - 2241 Electrical and Electronics Engineering Technologists and Technicians
 - 2253 Drafting Technologists and Technicians
 - 2254 Land Survey Technologists and Technicians
- Heavy Equipment Operators:
 - 7312 Heavy-Duty Equipment Mechanics
 - 7412 Heavy Equipment Operators
- Line Workers:
 - 7212 Contractors and Supervisors, Electrical Trades and Telecommunications Occupations
 - 7244 Electrical Power Line and Cable Workers
- Ground Workers:
 - 0711 Construction Managers
 - 7217 Contractors and Supervisors, Heavy Construction Equipment Crews
 - 7611 Construction Trades Helpers and Labourers
 - 7612 Other Trades Helpers and Labourers

Decommissioning will primarily be completed by Contractors, with Newfoundland Power crews assisting with distribution crossings and substation connections. A Newfoundland Power site representative will be available. Newfoundland Power is committed to supporting its employees and

contractors, ensuring the principals of inclusion and equality are integrated company-wide and within the workplace.

3.0 APPROVAL OF THE UNDERTAKING

Other permits and authorizations that may be required for the Project are listed in Table 3.1.

Table 3.1. Permits and Authorizations Required for the Project

Permit	Responsible Authority
Federal	
DFO Blanket Permit	Fisheries and Oceans Canada
Permits Authorizing an Activity Affecting Listed Wildlife Species Regulations	SARA
Provincial	
Release of the Undertaking under the Environmental Assessment Regulations	Department of Environment and Climate Change
T 'Railway Provincial Park Permit	Department of Tourism, Culture, Arts and Recreation
Blanket Permit – Fording and Various Work Activities	Department of Environment and Climate Change
Certificates of Approval for any Instream Activity	Department of Environment and Climate Change
Access to Highway Permit	Department of Transportation and Infrastructure and/or Digital Government and Service NL
Certificate of Approval for Storing and Handling Gasoline and Associated Products	Engineering Services Division, Digital Government and Service NL
Compliance Standard pursuant to the Fire Prevention Act	Engineering Services Division, Digital Government and Service NL
Compliance Standard pursuant to Environmental Protection Act, Air Pollution Control Regulations	Department of Environment and Climate Change
Compliance Standard pursuant to Workplace Hazardous Materials Information System (WHMIS) Regulations, under the Occupational Health and Safety Act	Digital Government and Service NL
Compliance Standard pursuant to Occupational Health and Safety Act and Regulations	Digital Government and Service NL
Certificate of Approval for a Waste Management System	Department of Environment and Climate Change
Registration as required in Section 13 of the Storage and Handling of gasoline and associated Products Regulations, 2003	Department of Environment and Climate Change
Permit to Burn	Department of Fisheries, Forestry, and Agriculture

4.0 SCHEDULE

The proposed schedule for the Project is outlined in Table 4.1. The 101L and 102L Transmission Lines are planned to be decommissioned sequentially by the Contractor.

Table 4.1. Proposed Project Schedule

Project Component	Proposed Date
Registration of Environmental Assessment	March 2022
Decommissioning of the 101L and 102L Transmission Lines	Starting Mid-April 2022

5.0 FUNDING

The Project does not depend on funding.

6.0 REFERENCES

Atlantic Canada Conservation Data Centre (ACCDC). (2022). Data Request RQ0944.

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Department of Fisheries and Oceans Canada (DFO). (2021). *Angler's Guide 2021-2022 - Annex 7 - Newfoundland and Labrador scheduled Salmon Rivers*. Retrieved from <https://www.nfl.dfo-mpo.gc.ca/en/NL/AG/ScheduledSalmonRivers>

Endangered Species Act, SNL 2001, c E-10.1

Environmental Assessment Regulations, 2003, NLR 54/03

Newfoundland and Labrador Department of Environment and Climate Change Water (NL ECC) Resource Management Division. (2018). *Chapter 10: Environmental Guidelines for General Construction Practices*. Retrieved from <https://www.gov.nl.ca/ecc/files/waterres-regulations-appforms-chapter10.pdf>

Fisheries Act, RSC 1985, c F-14

Newfoundland and Labrador Fishery Regulations, SOR/78-443

Species at Risk Act, SC 2002, c 29

The Canadian Encyclopedia. (2014). *Gander River*. Retrieved from <https://www.thecanadianencyclopedia.ca/en/article/gander-river>

Water Resources Act, SNL 2002, c W-4.01

7.0 STATEMENT OF QUALIFICATIONS AND LIMITATIONS

This Report (the “Report”) has been prepared by Strum Consulting (“Consultant”) for the benefit of Newfoundland Power (“Client”) in accordance with the agreement between Consultant and Client, including the scope of work detailed therein (the “Agreement”).

The information, data, recommendations, and conclusions contained in the Report (collectively, the “Information”):

- is subject to the scope, schedule, and other constraints and limitations in the Agreement and the qualifications contained in the Report (the “Limitations”)
- represents Consultant’s professional judgement in light of the Limitations and industry standards for the preparation of similar reports
- may be based on information provided to Consultant which has not been independently verified
- has not been updated since the date of issuance of the Report and its accuracy is limited to the time period and circumstances in which it was collected, processed, made or issued
- must be read as a whole and sections thereof should not be read out of such context
- was prepared for the specific purposes described in the Report and the Agreement
- in the case of subsurface, environmental, or geotechnical conditions, may be based on limited testing and on the assumption that such conditions are uniform and not variable either geographically or over time

Consultant shall be entitled to rely upon the accuracy and completeness of information that was provided and has no obligation to update such information. Consultant accepts no responsibility for any events or circumstances that may have occurred since the date on which the Report was prepared and, in the case of subsurface, environmental, or geotechnical conditions, is not responsible for any variability in such conditions, geographically or over time.

Consultant agrees that the Report represents its professional judgement as described above and that the Information has been prepared for the specific purpose and use described in the Report and the Agreement, but Consultant makes no other representations, or any guarantees or warranties whatsoever, whether express or implied, with respect to the Report, the Information or any part thereof.

The Report is to be treated as confidential and may not be used or relied upon by third parties, except:

- as agreed in writing by Consultant and Client
- as required by law
- for use by governmental reviewing agencies

Consultant accepts no responsibility, and denies any liability whatsoever, to parties other than Client who may obtain access to the Report or the Information for any injury, loss, or damage suffered by such parties arising from their use of, reliance upon, or decisions or actions based on the Report or any of the Information (“improper use of the Report”), except to the extent those parties have obtained the prior written consent of Consultant to use and rely upon the Report and the Information. Any damages arising from improper use of the Report or parts thereof shall be borne by the party making such use.

This Statement of Qualifications and Limitations forms part of the Report and any use of the Report is subject to the terms hereof.









Should additional information become available, Strum requests that this information be brought to our attention immediately so that we can re-assess the conclusions presented in this report.

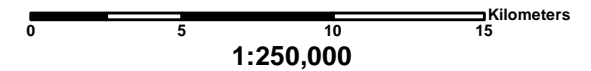
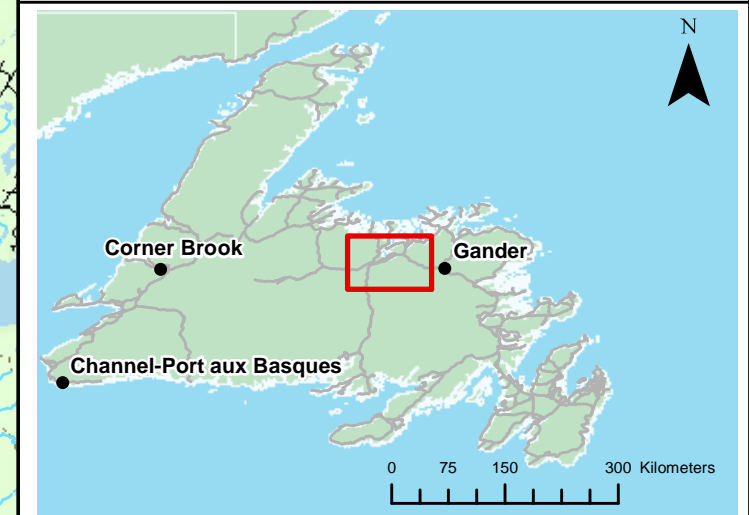
APPENDIX A
DRAWINGS

Newfoundland Power Transmission Line Decommissioning

Site Overview

Legend

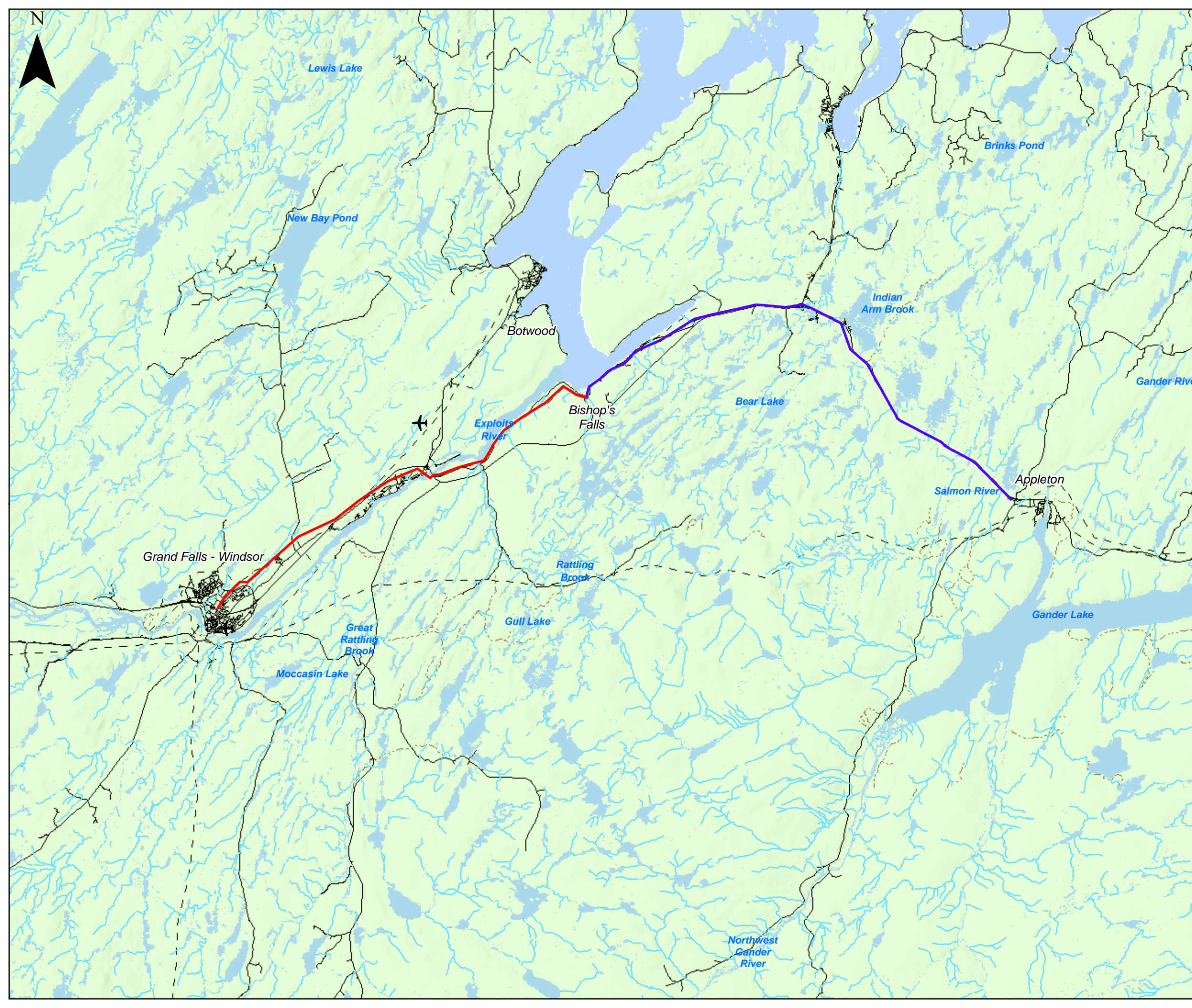
- | | | |
|---|------------------------|---|
|  | Aerodrome | Water Features |
|  | 101L Transmission Line |  Mapped Watercourses |
|  | 102L Transmission Line |  Lakes, Rivers & Ponds |
|  | Power Lines | |
| Transportation | | |
|  | Public Road | |
|  | Trails | |



NAD83 UTM Zone 21 North Sources: ESRI Basemaps, Canvec Open Data

Drawn By: E. Johnson	Checked By: N. Myers	Drawing #: 1
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Date: February 2022	Project #: 22-8456
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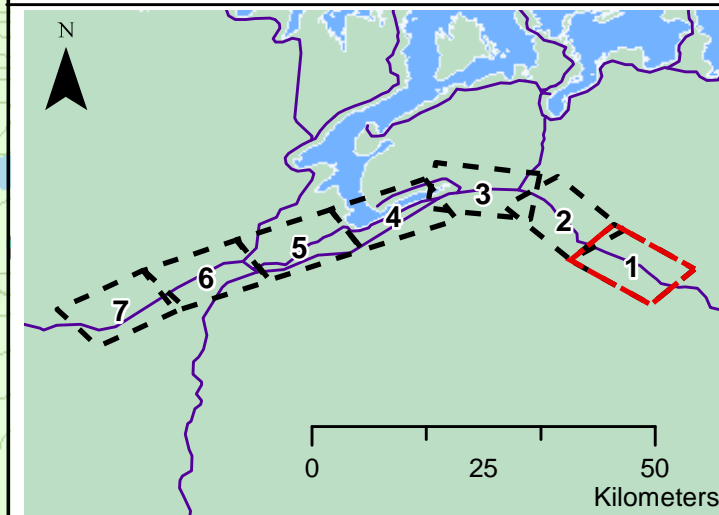


Newfoundland Power Transmission Line Decommissioning

Salmon Bearing Rivers and Tributaries

Legend

- | | | | |
|--|------------------------|--|-----------------------|
| | Aerodrome | | Public Water Supplies |
| | Salmon Bearing Rivers | | Appleton |
| | 101L Transmission Line | | Campbellton |
| | 102L Transmission Line | | Gander |
| | Power Lines | | Glenwood |
| | Local Road | | Loon Bay |
| | Expressway-Highway | | Stoneville |
| | Freeway | | Watercourses |
| | Ramp | | Mapped Wetlands |
| | Trails | | Lakes, Rivers & Ponds |
| | Contours | | |



0 1.5 3 Kilometers

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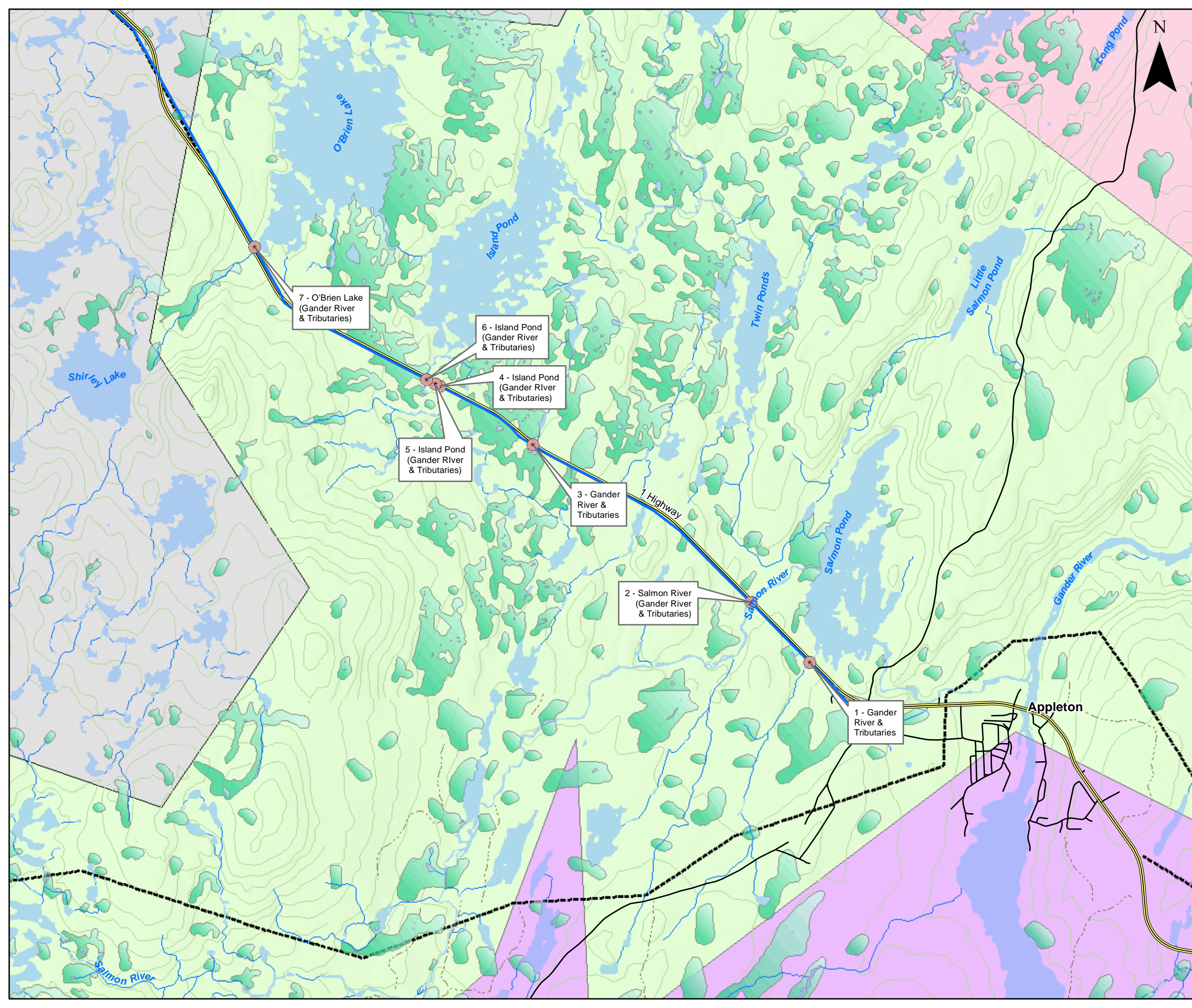
NAD83 UTM Zone 21 North Sources: ESRI Basemaps, Canvec Open Data

Drawn By: E. Johnson Checked By: N. Myers Drawing #: 2 - 1

Date: February 2022 Project #: 22-8456



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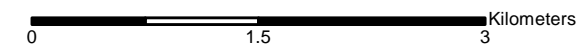
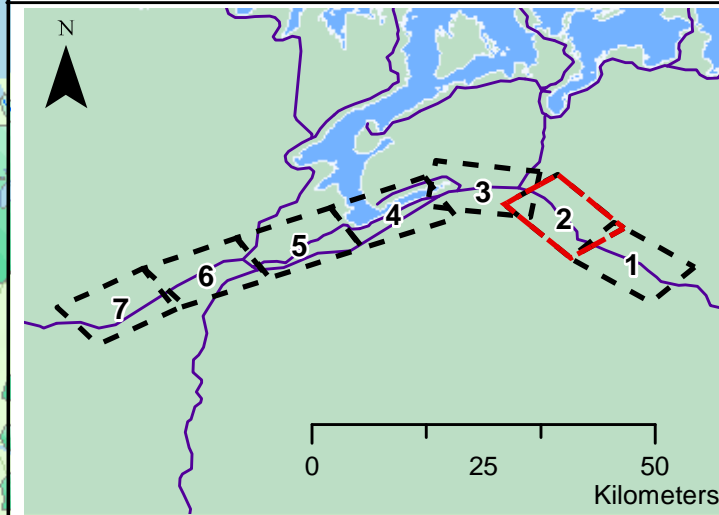


Newfoundland Power Transmission Line Decommissioning

Salmon Bearing Rivers and Tributaries

Legend

- | | | | |
|-----------------------|------------------------|--|-----------------------|
| | Aerodrome | | Campbellton |
| | Salmon Bearing Rivers | | Loon Bay |
| | 101L Transmission Line | | Watercourses |
| | 102L Transmission Line | | Mapped Wetlands |
| | Power Lines | | Lakes, Rivers & Ponds |
| Transportation | | | |
| | Local Road | | |
| | Expressway-Highway | | |
| | Freeway | | |
| | Ramp | | |
| | Trails | | |
| | Contours | | |



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NAD83 UTM Zone 21 North

Sources: ESRI Basemaps, Canvec Open Data

Drawn By: E. Johnson

Checked By: N. Myers

Drawing #: 2 - 2

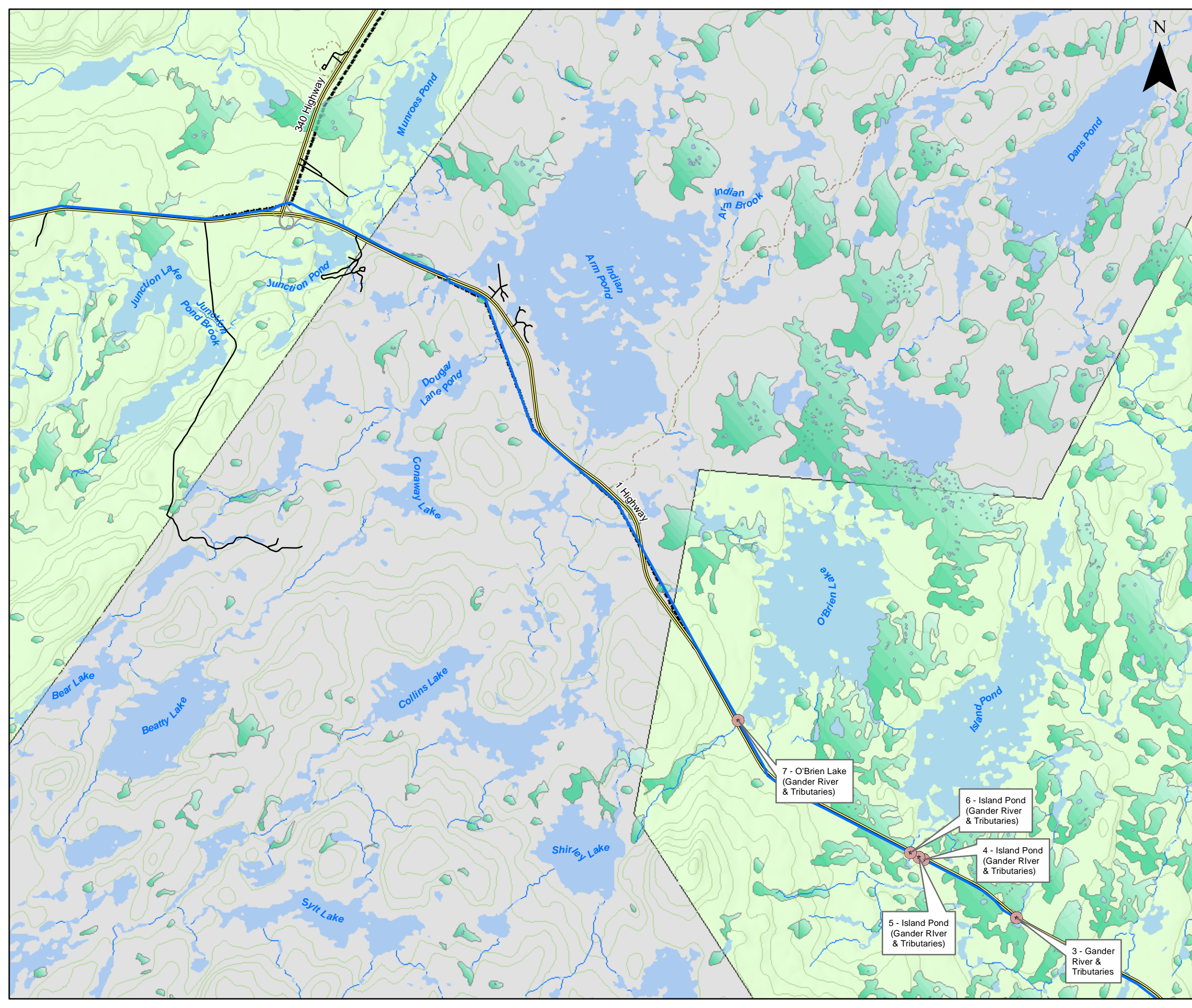
Date: February 2022

Project #: 22-8456

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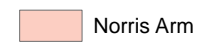

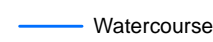



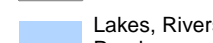





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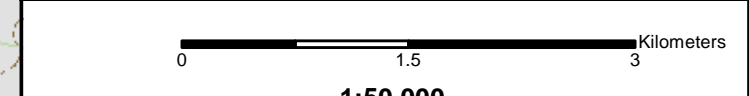
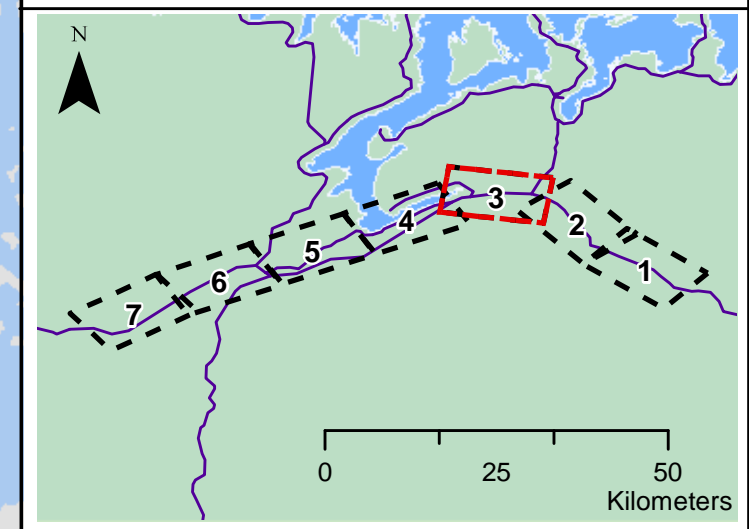


Newfoundland Power Transmission Line Decommissioning

Salmon Bearing Rivers and Tributaries

Legend

- | | | | |
|---|------------------------|---|-----------------------|
|  | Aerodrome |  | Campbellton |
|  | Salmon Bearing Rivers |  | Lewisporte |
|  | 101L Transmission Line |  | Norris Arm |
|  | 102L Transmission Line |  | Watercourses |
|  | Power Lines |  | Mapped Wetlands |
|  | Local Road |  | Lakes, Rivers & Ponds |
|  | Expressway-Highway | | |
|  | Freeway | | |
|  | Ramp | | |
|  | Trails | | |
|  | Contours | | |

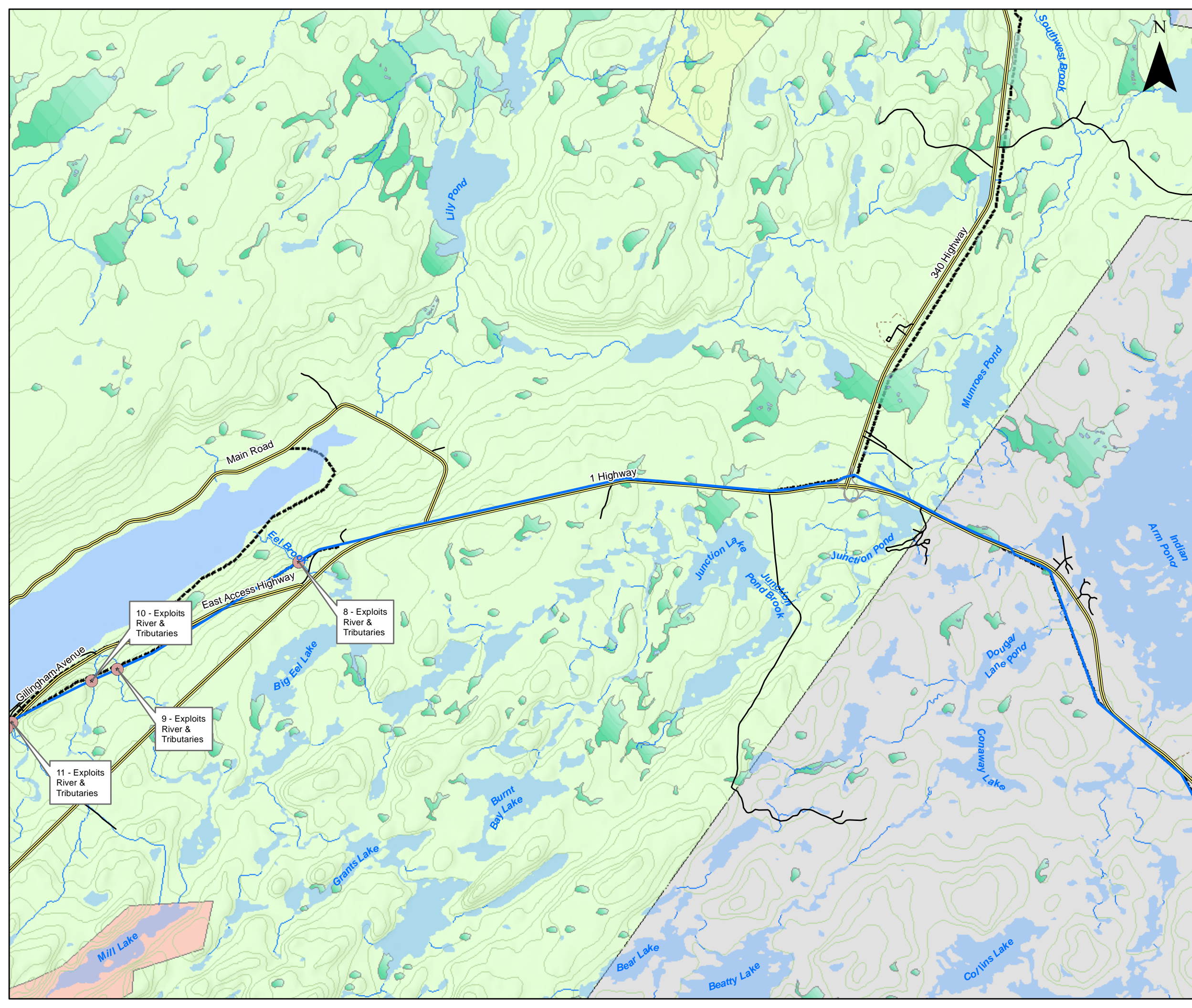


NAD83 UTM Zone 21 North Sources: ESRI Basemaps, Canvec Open Data

Drawn By: E. Johnson	Checked By: N. Myers	Drawing #: 2 - 3
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Date: February 2022	Project #: 22-8456
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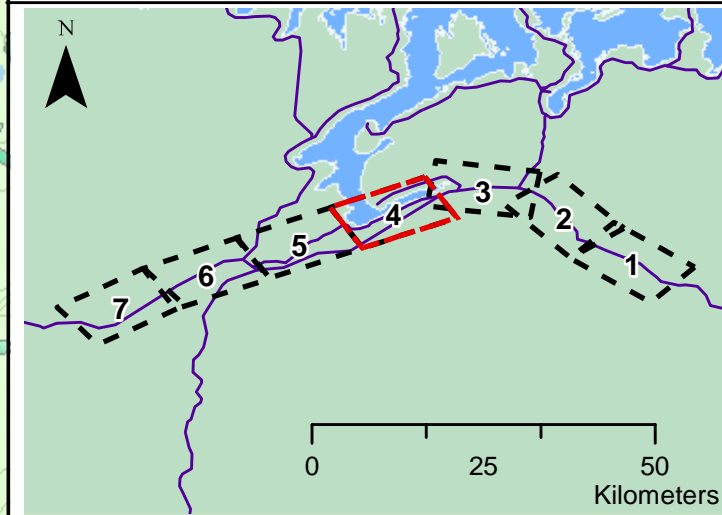


Newfoundland Power Transmission Line Decommissioning

Salmon Bearing Rivers and Tributaries

Legend

- | | | | |
|-----------------------|------------------------|--|-----------------------|
| | Aerodrome | | Campbellton |
| | Salmon Bearing Rivers | | Norris Arm |
| | 101L Transmission Line | | Watercourses |
| | 102L Transmission Line | | Mapped Wetlands |
| | Power Lines | | Lakes, Rivers & Ponds |
| Transportation | | | |
| | Local Road | | |
| | Expressway-Highway | | |
| | Freeway | | |
| | Ramp | | |
| | Trails | | |
| | Contours | | |



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NAD83 UTM Zone 21 North

Sources: ESRI Basemaps, Canvec Open Data

Drawn By: E. Johnson

Checked By: N. Myers

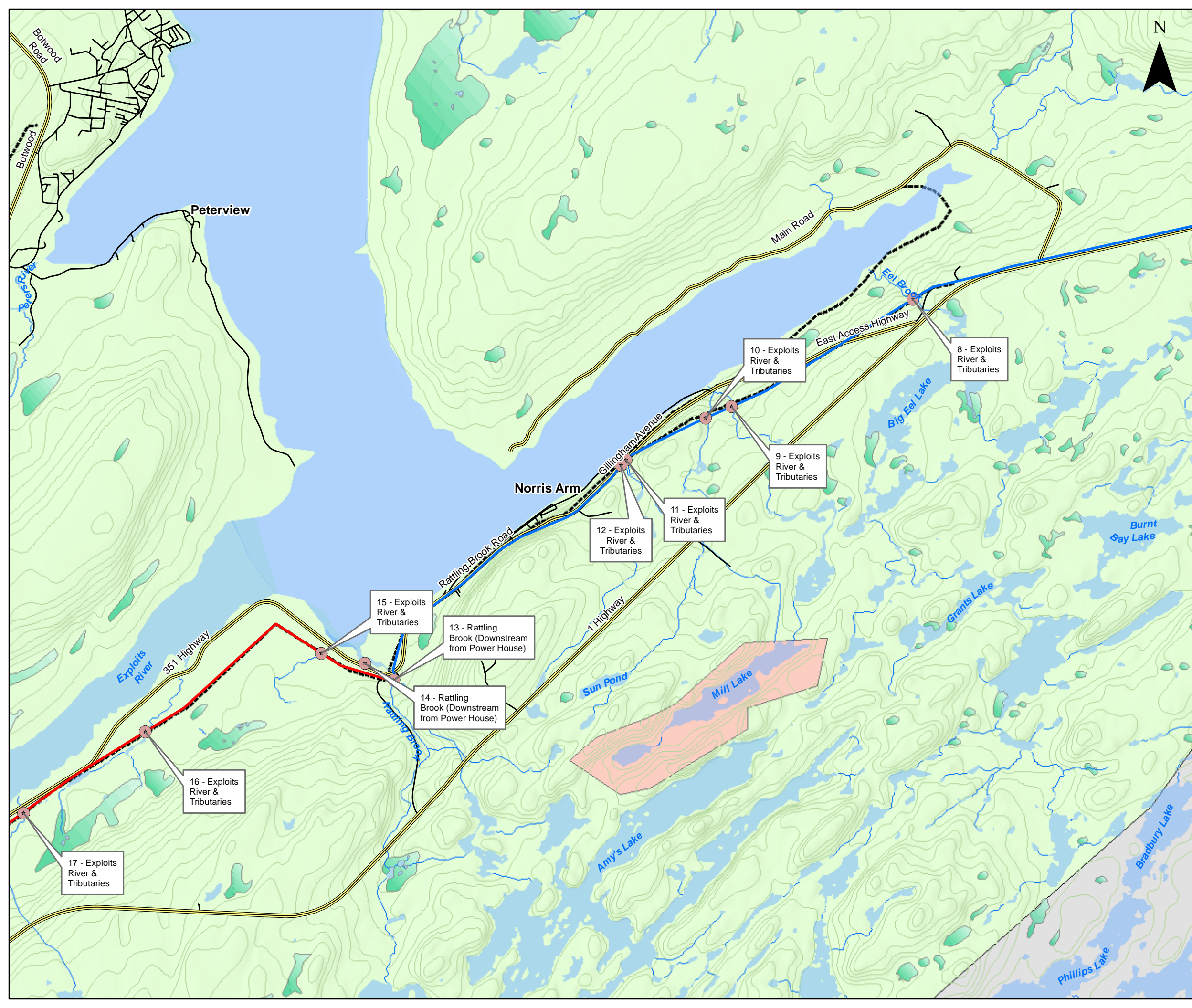
Drawing #: 2 - 4

Date: February 2022

Project #: 22-8456

















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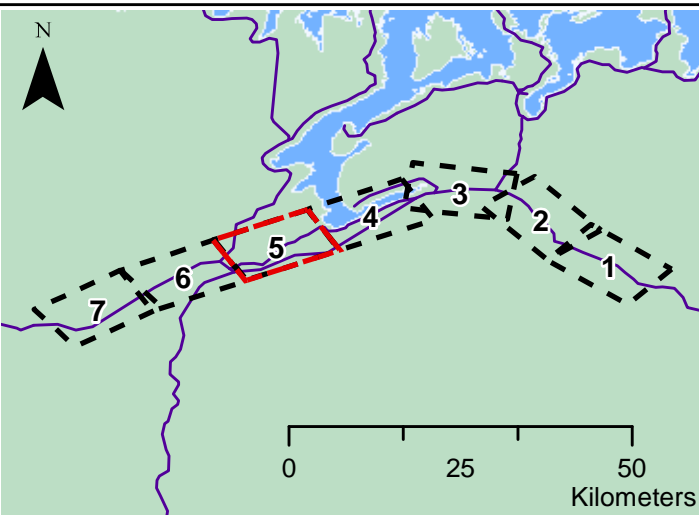


Newfoundland Power Transmission Line Decommissioning

Salmon Bearing Rivers and Tributaries

Legend

-  Aerodrome
-  Salmon Bearing Rivers
-  101L Transmission Line
-  102L Transmission Line
-  Power Lines
-  Local Road
-  Expressway-Highway
-  Freeway
-  Ramp
-  Trails
-  Contours
-  Watercourses
-  Mapped Wetlands
-  Lakes, Rivers & Ponds



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NAD83 UTM Zone 21 North

Sources: ESRI Basemaps, Canvec Open Data

Drawn By: E. Johnson

Checked By: N. Myers

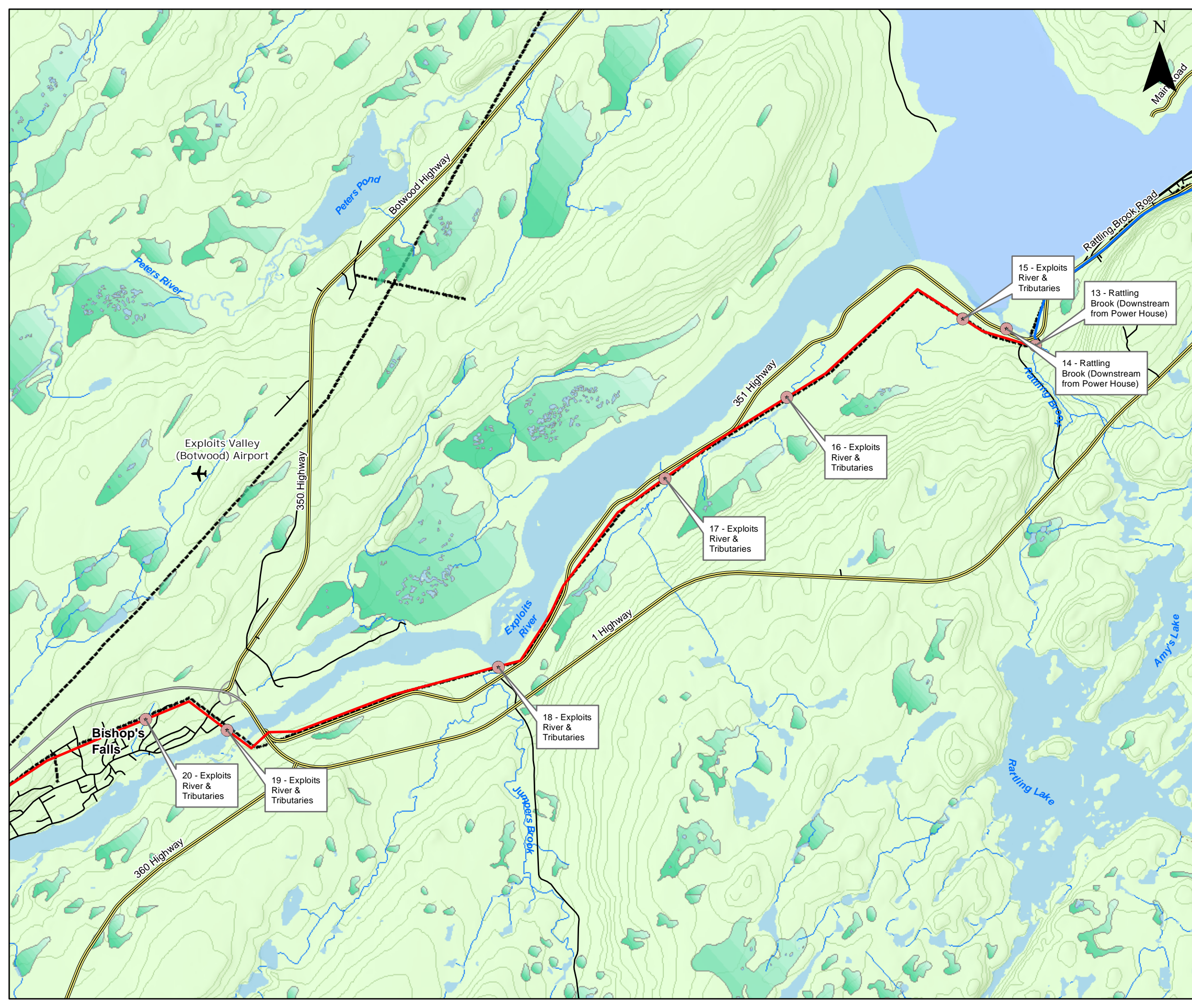
Drawing #: 2 - 5

Date: February 2022

Project #: 22-8456

















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Newfoundland Power Transmission Line Decommissioning

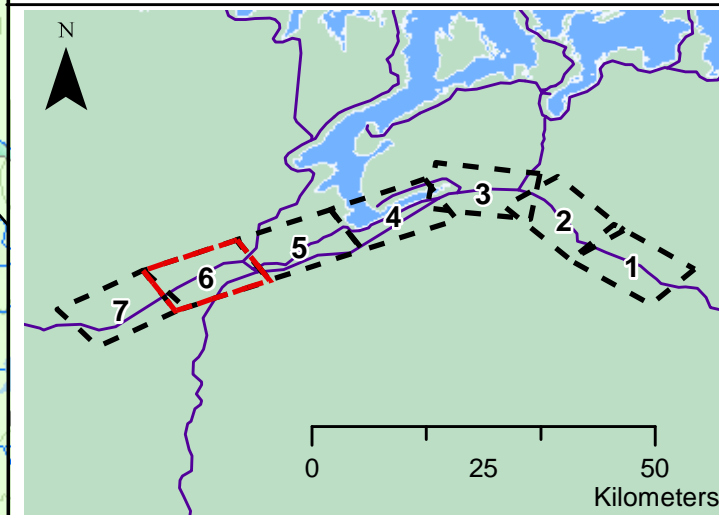
Salmon Bearing Rivers and Tributaries

Legend

-  Aerodrome
-  Salmon Bearing Rivers
-  101L Transmission Line
-  102L Transmission Line
-  Power Lines
-  Local Road
-  Expressway-Highway
-  Freeway
-  Ramp
-  Trails
-  Contours
-  Watercourses
-  Mapped Wetlands
-  Lakes, Rivers & Ponds

Transportation

-  Local Road
-  Expressway-Highway
-  Freeway
-  Ramp
-  Trails
-  Contours



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NAD83 UTM Zone 21 North

Sources: ESRI Basemaps, Canvec Open Data

Drawn By: E. Johnson

Checked By: N. Myers

Drawing #: 2 - 6

Date: February 2022

Project #: 22-8456

















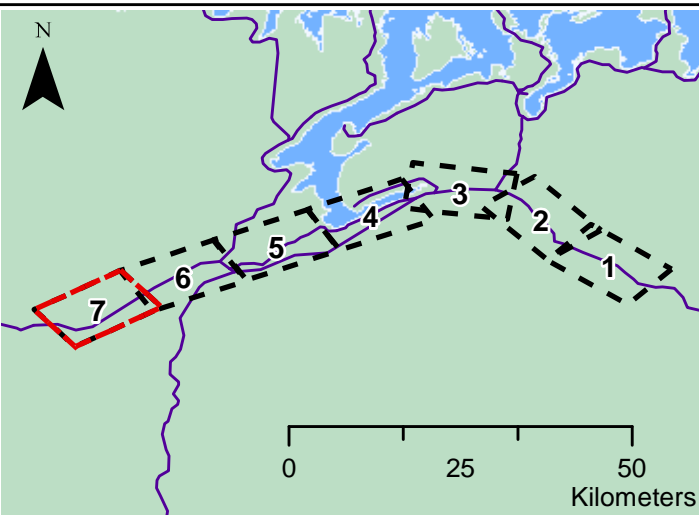
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Newfoundland Power Transmission Line Decommissioning

Salmon Bearing Rivers and Tributaries

Legend

-  Aerodrome
-  Salmon Bearing Rivers
-  101L Transmission Line
-  102L Transmission Line
-  Power Lines
-  Local Road
-  Expressway-Highway
-  Freeway
-  Ramp
-  Trails
-  Contours
-  Watercourses
-  Mapped Wetlands
-  Lakes, Rivers & Ponds



0 1.5 3 Kilometers

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NAD83 UTM Zone 21 North Sources: ESRI Basemaps, Canvec Open Data

Drawn By: E. Johnson Checked By: N. Myers Drawing #: **2 - 7**

Date: **February 2022** Project #: **22-8456**



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