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1	Q.	Does Newfoundland Power have a URD cable replacement program such as when a
2		URD section fails 3 times, it is replaced and maybe the entire run of URD cable
3		sections are replaced?
4		
5	A.	Newfoundland Power does not have a replacement program specific to URD cables.
6		
7		URD cable replacement projects are assessed on an individual basis with consideration
8		given to factors such as the quantity of cable faults, cable age, reliability statistics and
9		cable location. These projects would typically be completed under the Company's
10		capital program as part of a distribution feeder project directed at plant replacement.

- capital program as part of a distribution feeder project directed at plant replacement. These projects would include the *Reconstruction* project, the *Rebuild Distribution Lines* project and the *Distribution Reliability Initiative*.¹ These projects are all aimed at maintaining the reliability of Newfoundland Power's distribution feeders.
- 15 Refer to the response for Request for Information PUB-NP-068 for more information on
 16 the Company's distribution maintenance practices.

See, for example, Newfoundland Power's 2014 Capital Budget Application, where approximately \$3.8 million and \$3.5 million were forecast for the *Reconstruction* and *Rebuild Distribution Lines* projects, respectively. Additional expenditure for distribution plant replacement occurs annually in Company capital budgets to replace deteriorated meters, services, transformers and streetlights. Occasionally, specific distribution projects will be required, such as the 2014 capital expenditure of approximately \$14.5 million approved by the Board in Order No. P.U. 43 (2013) to replace the submarine distribution cable system that supplies electricity to Bell Island.