

1 Q. Hydro stated that the proposed CIAC project work, if aligned with the approved WPF Program
2 work, will allow for execution efficiencies. Quantify these efficiencies and how they are reflected
3 in the WPF Program and CIAC Project.

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6 A. Aligning the proposed Contribution in Aid of Construction ("CIAC") project and the approved
7 Worst Performing Feeder ("WPF") program will result in efficiencies associated with schedule
8 and cost, primarily for the CIAC customer. By aligning the two projects in the early stages of the
9 design and planning process, line modifications required for the CIAC customer can be
10 incorporated during the WPF upgrades to avoid re-work at a later date.

11 Constructing the new line as originally planned under the WPF project would require the line to
12 subsequently be reconductored with the inclusion of additional structures and equipment, and
13 would result in the stranding of assets installed under the WPF program. In addition, in order to
14 complete this future work without requiring extended outages to residential customers in the
15 area, alternative generation would be required. This would result in service interruptions to
16 customers while the generation was being implemented. The CIAC customer would incur
17 additional costs as a result of the alternative generation and requirement to remobilize
18 resources to replace the existing conductor and install any associated support infrastructure.

19 To accurately quantify the execution efficiencies, an additional cost estimate would be required
20 in order to identify the costs associated with completing the CIAC work, following
21 commissioning of the WPF program.