Q. Please provide a valuation of the life of these transmission lines and how it has been determined that these transmission lines need to be rebuilt in 2020 or 2021 and 2022 and how that decision was reached?

A. Newfoundland Power has not completed a valuation of the life of the transmission lines that need to be rebuilt in 2020 or 2021 and 2022. The valuation of transmission line assets would involve a complex process of attributing a financial value to an existing transmission line and quantifying the financial benefits and cost associated with rebuilding. The decision to rebuild the Company's transmission lines is not based on a valuation of the life of the lines.

Newfoundland Power filed a multi-year plan to rebuild its aging and deteriorated transmission lines as part of its 2006 Capital Budget Application (the "Transmission Line Rebuild Strategy," or the "Strategy"). <sup>1</sup>

The Strategy outlines a structured approach to rebuilding the Company's oldest and most deteriorated lines and establishes that required rebuild projects would be prioritized based on: (i) the physical condition of the lines; (ii) the risk of failures; and (iii) the impact a failure would have on customers. Details on the methodology, execution and relevance of Newfoundland Power's Strategy were provided in response to Request for Information PUB-NP-007.

Through Newfoundland Power's annual engineering review process, transmission lines 363L, 403L and 49L were identified for rebuilding based on the criteria outlined above. Newfoundland Power's 2020 Capital Budget Application, Report 3.1 2020 Transmission Line Rebuild, page 2-5, provides details on the engineering review, which includes transmission line condition, inspection findings and engineering recommendations.

See Newfoundland Power's 2006 Capital Budget Application, Volume II, Supporting Materials, report 3.1 Transmission Line Rebuild Strategy. An update to the Strategy was filed as part of the Company's 2008 Capital Budget Application. The primary purpose of the update was to provide updated cost estimates to reflect inflationary increases. The methodology remained the same.