

- 1 **Q. In CA-NP-155(e) NP states "In Newfoundland Power's view, the record of this**  
 2 **proceeding provides fulsome information that the replacement of CSS is necessary to**  
 3 **continue providing least-cost, reliable service to customers."**  
 4
- 5 a) **Does EY also believe that NP will be unable to provide least-cost, reliable**  
 6 **service if the project is delayed by two to five years?**  
 7
- 8 b) **Did EY specifically address this issue in its report?**  
 9
- 10 c) **Are other jurisdictions using a CSS configuration similar to NP's existing**  
 11 **CSS able to provide least-cost, reliable service? Please explain.**  
 12
- 13 d) **Please provide details of every contact EY made with other jurisdictions in**  
 14 **reference to their systems and any analysis EY took in comparative costing**  
 15 **with these jurisdictions in the purchase and installation of their CSS systems.**  
 16
- 17 e) **If EY did not contact any other jurisdictions in reference to the above, please**  
 18 **detail as to why this oversight?**  
 19
- 20 A. a) In EY's 2020 assessment and planning report, EY concluded replacement of the  
 21 CSS is the only viable option to mitigate the technical and functional risks facing  
 22 Newfoundland Power. Reference CA-NP-183 for details of the options  
 23 assessment and option recommended. Reference PUB-NP-023 for response  
 24 related to risks and costs of delay.  
 25
- 26 b) See part a.  
 27
- 28 c) We are unaware of any other utility using a configuration similar to  
 29 Newfoundland Power's CSS. Newfoundland Power's CSS is unique – it is 28-  
 30 years old and has been highly customized with many edge systems/system  
 31 interfaces, many of which are also highly customized.  
 32
- 33 d) EY performed jurisdictional scanning leveraging both internal and external  
 34 contacts. EY did not undertake comparative costing to specific jurisdictions as we  
 35 did not feel such analysis would be useful for the purposes of developing  
 36 Newfoundland Power's cost estimate. Refer to CA-NP-190 regarding  
 37 comparability of estimates/actual costs.  
 38
- 39 Refer to CA-NP-176, which provides the assessment process to arrive at the cost  
 40 estimate recommended to Newfoundland Power.  
 41
- 42 e) See part d.