

1 **Q. At pages 2-17 to 2-31, it appears that despite the rugged terrain Newfoundland**
2 **Power’s system has proven very reliable in the face of increased significant events.**
3 **Can NP confirm this judgement and compare its system over the period 2010-2020**
4 **with that of Nova Scotia Power and Maritime Electric on the basis of the age of the**
5 **plant and equipment in its system, for example, using net to gross plant in service or**
6 **any other metric the company judges to be more useful.**

7
8 A. Newfoundland Power confirms that its system has generally proven to be reliable in the
9 face of significant events. However, significant events have led to prolonged customer
10 outages to the Company’s customers. For example, significant events resulted in an
11 average of 11 hours of outages to customers in 2010 due to Hurricane Igor and a severe
12 ice storm.

13
14 The reliability experienced by Newfoundland Power’s customers principally reflects the
15 general condition of the Company’s electrical system. Newfoundland Power maintains
16 the condition of its electrical system by applying national construction and maintenance
17 standards, and by using inspection and maintenance guidelines that reflect industry best
18 practices.¹

19
20 The primary engineering standard used by the Company is Canadian Standards
21 Association (“CSA”) standard *C22.3 No. 1-15, Overhead Systems*. This standard guides
22 the construction of overhead distribution and transmission systems. It recognizes 4
23 classifications of loading conditions for ice accumulation, wind loading, and temperature.
24 These are: (i) medium loading B; (ii) medium loading A; (iii) heavy; and (iv) severe.

25
26 Based on weather conditions, this standard requires that Newfoundland Power’s electrical
27 system be constructed and maintained to a higher standard than most areas in the country.
28 The Company’s service territory has heavy and severe loading classifications. Only 2
29 other provinces throughout Canada are identified as having severe weather loading areas.
30 These are: (i) parts of northern and southern Manitoba; and (ii) rural parts of eastern
31 Quebec, including the Gaspé Peninsula.²

¹ The last independent review of Newfoundland Power’s engineered operations was conducted by the Board’s consultant, The Liberty Consulting Group (“Liberty”), in 2014. Liberty concluded: “*Newfoundland Power’s transmission line and pole inspection and corrective maintenance practices conform to good utility practices.*” See Liberty’s *Report on Island Interconnected System to Interconnection with Muskrat Falls addressing Newfoundland Power Inc.*, December 17, 2014, page ES-2.

² See the *2022/2023 General Rate Application, Volume 1, Application, Company Evidence and Exhibits, Section 3: Finance*, page 3-38, footnote 96.

1 Table 1 provides the average duration of customer outages (“SAIDI”) over the period
2 2010 to 2020 for Newfoundland Power and utilities in the Maritime Provinces.³

**Table 1:
Average SAIDI
(2010 to 2020)**

	Normal Operating Conditions	Significant Events	Total
Newfoundland Power	2.58	2.35	4.93
Average of Maritime Provinces	2.90	9.85	12.75

3 From 2010 to 2020, the average duration of outages experienced by Newfoundland
4 Power’s customers during normal operating conditions and significant events has been
5 less than the average of the Maritime Provinces. This primarily reflects the fact that
6 national standards require Newfoundland Power’s electrical system to be built to a higher
7 standard than utilities in the Maritime provinces.

³ SAIDI indicates “System Average Interruption Duration Index.” This data was obtained through the Canadian Electricity Association and includes Nova Scotia Power, Maritime Electric and NB Power. Due to a confidentiality agreement, Newfoundland Power can only provide aggregate data.