Q. (Reference Application Schedule B, Distribution Reliability Initiative, page 10) It is stated "*This would be inconsistent with maintaining acceptable and equitable levels of service reliability for customers throughout Newfoundland Power's service territory*."

a) Please define "*acceptable and equitable levels of service reliability*".
b) Is it not a fact that some customers on Newfoundland Power's system receive reduced levels of reliability relative to others?
c) How do Newfoundland Power's SAIDI and SAIFI levels compare to Hydro's?
d) Are Hydro and Newfoundland Power subject to the same legislative requirements?

A. a) For a discussion of how Newfoundland Power defines reliable service, see the response to Request for Information CA-NP-017.

b) For a discussion of Newfoundland Power's service reliability, see the response to Request for Information CA-NP-085.

c) Newfoundland Power observes that Hydro's SAIDI and SAIFI levels are generally higher than Newfoundland Power's. This is primarily a result of the differences in the utilities' service territories and is confirmed by Hydro in its most recent capital budget application.[1]

d) Newfoundland Power provides service to customers in a manner consistent with the provisions of the *Public Utilities Act* (the "Act") and the *Electrical Power Control Act, 1994* (the "EPCA"). The Act and the EPCA apply to both Newfoundland Power and Hydro.

[1] In its Application, Hydro states, "*Whereas EC Region 2 consists of utilities with a mix of rural and urban customers, Hydro's distribution customers are widely dispersed, geographically, and are primarily located in rural and/or remote areas; for this reason, Hydro's reliability metrics for Service Continuity are comparatively higher than the EC Region 2 average*." See Hydro's *2023 Capital Budget Application, 2023 Capital Budget Overview, Section 4.1 Utility Reliability*.