

1 **Q. (Reference Application Schedule B, Distribution Reliability Initiative, page 10)**
 2 **It is stated “Customers served by distribution feeder SUM-01 are experiencing**
 3 **significantly worse service reliability than the average reliability experienced**
 4 **by Newfoundland Power’s customers.”**

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 6 **a) For how long has this been the case?**

7 **b) Please provide a list of all complaints relating to reliability of supply by**
 8 **customers served by this feeder.**

9 **c) What percentage of all complaints related to reliability on Newfoundland**
 10 **Power’s system does this represent?**

11 **d) Were newer technologies with environmental benefits such as**
 12 **distributed generation, renewable energy forms and rate design**
 13 **considered?**

14
 15 **A. a)** Distribution feeder SUM-01 has been included in Newfoundland Power’s list of
 16 worst performing feeders since 2014. From 2014 to 2019, analysis indicated that
 17 the poor reliability performance of distribution feeder SUM-01 was caused by
 18 specific events and no work was required.¹

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 20 **b)** Newfoundland Power does not capture data related to customer complaints
 21 about reliability by feeder. See the response to Request for Information
 22 CA-NP-083 for further information.

23
 24 **c)** See part b).

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 26 **d)** An engineering review has identified deterioration and deficiencies along a
 27 6.5 kilometre section of feeder that include deteriorated conductor, insulators,
 28 and poles as the main contributor to the poor reliability performance of
 29 distribution feeder SUM-01. Technologies such as distributed generation,
 30 renewable energy forms and rate design would not appropriately address these
 31 deficiencies and would not be a suitable alternative to address the poor reliability
 32 experienced by customers.

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 34 For additional information on Newfoundland Power’s assessment of non-wires
 35 alternatives, such as distributed generation, renewable energy forms and rate
 36 design, see the response to Request for Information CA-NP-101.

¹ See the 2023 Capital Budget Application, report 1.1 Distribution Reliability Initiative, page 8.