Q. Reference: Schedule 6, Program 13 Renew Distribution Feeders (2024-2025), Page 2, line 5–18

It is stated that Hydro had discontinued its condition-based asset renewal program for distribution feeders when it introduced its Worst-Performing Feeders program in 2019. Please explain the factors Hydro considered in evaluating the need to re-introduce a condition-based program and the process Hydro used in making the decision to re-instate the program. In making the decision to re-instate the program did Hydro consider the practices of other Canadian utilities?

A. Newfoundland and Labrador Hydro ("Hydro") considered several factors when evaluating the need to re-introduce a condition-based asset renewal program for distribution feeders. Since the termination of the former condition-based program in 2019, the number of deteriorated distribution components continues to grow, as they are not being targeted under the existing Worst-Performing Distribution Feeders program. It is anticipated that if the assets identified for refurbishment were not addressed in the near future, it would create a growing backlog of deficiencies that would present an increased risk to distribution system reliability. In addition, it would create a safety hazard for workers and the public, as Hydro does not allow distribution line components to remain in service until failure.

The proposed Renew Distribution Feeders (2024–2025) program<sup>1</sup> will allow Hydro to address those feeders within a preventive maintenance program, to ensure that the assets are not being operated to failure. This initiative will help to reduce corrective action work identified under the Upgrade Worst-Performing Distribution Feeders (2024–2025) program<sup>2</sup> while ensuring higher system reliability for customers.

<sup>&</sup>lt;sup>1</sup> "2024 Capital Budget Application," Newfoundland and Labrador Hydro, rev. August 18, 2023 (originally filed July 12, 2023), sch. 6, prog. 13.

<sup>&</sup>lt;sup>2</sup> "2024 Capital Budget Application," Newfoundland and Labrador Hydro, rev. August 18, 2023 (originally filed July 12, 2023), sch. 6, prog. 11.

- 1 Hydro observes that capital upgrades based on distribution asset conditions are common utility
- 2 practice; for example, Nova Scotia Power and Newfoundland Power Inc. both include asset
- 3 conditions in their methodologies for justifying distribution capital projects.