1	Q.	In Table 2-7, transmission costs are forecast to increase while distribution costs
2		decrease. Please explain why this is happening and if the company regards
3		transmission as more or less risky than distribution.
4		
5	A.	Newfoundland Power operates an integrated electrical system that includes both
6		distribution and transmission line assets. The majority of customer outages typically
7		occur on the distribution system. <sup>1</sup> However, a single transmission line can result in
8		outages to thousands of customers. Accordingly, both distribution and transmission line
9		assets can pose risks to the delivery of reliable service to customers.
10		
11		Distribution costs are decreasing due to operating cost reductions resulting from
12	2 implementation of the LED Street Lighting Replacement Pl	implementation of the LED Street Lighting Replacement Plan. <sup>2</sup>
13		
14	See response to Request for Information NLH-NP-014 for an expla	See response to Request for Information NLH-NP-014 for an explanation on the
15		operating cost increase for transmission.

<sup>&</sup>lt;sup>1</sup> See the 2022/2023 General Rate Application, Volume 1, Application, Company Evidence and Exhibits, Section 3: Finance, page 3-38, footnote 94.

<sup>&</sup>lt;sup>2</sup> See the 2022/2023 General Rate Application, Volume 1, Application, Company Evidence and Exhibits, Section 2: Customer Operations, page 2-34, footnote 77.