

1 **Q. (Reference CA-NP-104) It is stated “Newfoundland Power does not capture**
 2 **data related to customer complaints about reliability by feeder.”**

3 **a) Why not? Do customers place a high level of importance on reliability?**
 4 **Is tracking customer complaints about reliability inconsistent with**
 5 **Newfoundland Power’s mandate?**

6 **b) Please provide the detailed step-by-step process followed when a**
 7 **customer files a complaint with either Newfoundland Power or the**
 8 **Board.**

9 **c) Please provide the detailed step-by-step process followed when a**
 10 **customer files a dispute against Newfoundland Power.**

11 **d) Please file a summary list of complaints/disputes for each of the past 10**
 12 **years including a description of the complaint/dispute and any action**
 13 **taken.**

14
 15 **A. a)** Capital upgrades required to maintain the reliability of the distribution system are
 16 primarily condition based. Customer complaints are not required to identify
 17 requirements to replace or refurbish existing plant.

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 19 For example, the reference quoted in this Request for Information relates to
 20 Newfoundland Power’s *Distribution Reliability Initiative*. The *Distribution*
 21 *Reliability Initiative* targets the Company’s worst performing feeders for capital
 22 upgrades.¹ The worst performing feeders are identified based on an analysis of
 23 reliability indices. Whether capital upgrades to these feeders are required is
 24 determined through an engineering assessment that identifies the cause of the
 25 poor performance, such as deteriorated conductor or other deficient line
 26 components.

27
 28 Newfoundland Power has proposed the refurbishment of distribution feeder
 29 SUM-01 as part of the *Distribution Reliability Initiative* in 2023. An analysis of
 30 reliability indices determined that customers served by distribution feeder
 31 SUM-01 experience an outage duration that is approximately four times the
 32 Company’s corporate average. An engineering review, which included an
 33 analysis of outage data from the Company’s Outage Management System,
 34 attributed this poor performance to a specific section of line with deteriorated
 35 conductor and other deficiencies. Customer complaints for this feeder were not
 36 required to identify the poor performance of distribution feeder SUM-01 or the
 37 required capital upgrades.

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 39 Yes, customers place a high level of importance on reliability. The lowest level of
 40 customer satisfaction the Company has recorded was during the first quarter of
 41 2014 following widespread customer outages known as #darkNL.

42
 43 Newfoundland Power’s mandate is to provide service to customers in a manner
 44 consistent with the provisions of the *Public Utilities Act* and the *Electrical Power*
 45 *Control Act, 1994*. The *Electrical Power Control Act, 1994* contains the provincial
 46 power policy, which requires customers be provided with reliable service at the

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

1 lowest possible cost. Tracking customer complaints would not be inconsistent
2 with Newfoundland Power's mandate, but is not required to ensure the Company
3 provides reliable, least-cost service to its customers.
4

- 5 b) In Newfoundland Power's view, customer issues should be responded to and
6 resolved as quickly as possible and on a case-by-case basis tailored to a
7 customer's needs. The Company does not maintain prescribed, step-by-step
8 procedures that are to be followed whenever a customer files a complaint or
9 dispute. Rather, the procedures used vary based on the nature and complexity
10 of the complaints or disputes received.
11

12 Typically, the first point of contact for any customer with an issue related to their
13 service is the Customer Contact Centre where the customer will speak to a
14 Customer Service Representative. If the situation involves reliability of supply,
15 the call will typically be referred to a Customer Service Specialist. The specialist
16 will review the nature and history of reliability and outages in the customer's
17 area. This review will determine how the problem is to be resolved for the
18 customer.
19

20 Newfoundland Power does not have information on a step-by-step process that
21 may be followed by the Board upon receipt of a complaint.
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- 23 c) See part b).

- 24
25 d) Newfoundland Power receives an average of over 400,000 calls and over 100,000
26 emails from customers annually. The Company's Customer Service System
27 tracks customer interactions by the nature of the enquiry, such as a billing
28 enquiry, but does not categorize interactions as complaints or disputes. As a
29 result, the summary requested is not available.