

1 **Q. (Reference CA-NP-147)**
 2 **Has AMCL made recommendations that will enable NP to meet the**
 3 **requirements set out in the Provisional Guidelines? If so, please identify the**
 4 **specific recommendations.**
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6 A. Newfoundland Power has met the current information requirements of the Provisional
 7 Guidelines when the required information is available. Where the required information is
 8 not available, the Company has endeavoured to provide other available information to
 9 meet the spirit and intent of the Provisional Guidelines.¹
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11 Newfoundland Power's Asset Management Review, which is based on ISO 55000, closely
 12 aligns with the elements outlined in the Provisional Guidelines. The core principle of ISO
 13 55000 is that asset management balances cost, risk, and performance, which mirrors
 14 the policy statement of the Provisional Guidelines.²
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16 AMCL has recommended developing an Asset Information Strategy to enhance the
 17 Company's maturity and help meet the Provisional Guidelines' current information
 18 requirements.³ This strategy involves treating data as a managed asset and includes
 19 creating a vision, governance processes, data standards, and specifications. The
 20 strategy also serves as the foundation for further requirements in the Provisional
 21 Guidelines, such as quantified asset condition, life cycle costing, and risk evaluation.
 22

23 The Company does not collect all information necessary for these requirements and
 24 creating an Asset Information Strategy would be a logical first step in the journey to
 25 ensure asset management maturation and eventual compliance with the Provisional
 26 Guidelines. In some asset classes, compliance with these requirements will require
 27 changes to complex systems, processes and development of new data collection tools.
 28 As a result, this process will take time, resources and careful planning to ensure
 29 success.⁴
 30

31 Other areas of the company are more advanced toward collecting pertinent information.
 32 For example, the Electrical Engineering group has improved the information provided in
 33 Newfoundland Power's *2025 Capital Budget Application*, report *2.2 Substation Power*
 34 *Transformer Replacements*. The Company utilized the Electric Power Research Institute's
 35 Power Transformer Expert System software along with longstanding monitoring and
 36 inspection practices to diagnose and assess the condition of its power transformer fleet.
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1 ¹ In its correspondence of December 20, 2021, when implementing the Provisional Guidelines, the Board acknowledged, "While strict adherence to all aspects of the provisional guidelines may not be possible, the Board asks that the stakeholders make best efforts to respect the spirit and intent of the guidelines."

2 ² See the Provisional Guidelines, Page 1 of 18.

3 ³ See Newfoundland Power's *2025 Capital Budget Application*, *2025 Capital Budget Overview*, Appendix B.

4 ⁴ For example, a change management plan must be implemented to ensure all employees understand the new collection methods, data standards, and requirements.

Requests for Information

- 1 Newfoundland Power is currently working on the development of an implementation
- 2 plan that is expected to be completed by the end of 2024. The implementation plan will
- 3 include a roadmap for strategic and operational and data and technology initiatives. The
- 4 implementation plan will include a roadmap for strategic, operational, data and
- 5 technology initiatives.