**IN THE MATTER OF** the *Public Utilities Act*, R.S.N.L. 1990, Chapter P-47, as amended, (the "Act"); and

**IN THE MATTER OF** an application by Newfoundland Power Inc. ("Newfoundland Power") to establish customer electricity rates for 2025 and 2026 (the "Application").

Requests for Information by Newfoundland Power Inc.

To: Mr. C. Douglas Bowman

NP-CA-037 to NP-CA-041

May 8, 2024

## **Requests for Information**

NP-CA-037 Reference: Pre-Filed Evidence of C. Douglas Bowman, April 17, 2024.

> Please provide the results of any jurisdictional reviews completed by Mr. Bowman to support the recommendations in his Pre-Filed Evidence.

NP-CA-038 Reference: Pre-Filed Evidence of C. Douglas Bowman, April 17, 2024, page 47, lines 20-21.

> "Apparently, there is a controllable cost associated with SAIDI performance."

In Mr. Bowman's opinion, could there be incremental capital and operating cost increases associated with a decline in the overall reliability of the distribution system?

Reference: Pre-Filed Evidence of C. Douglas Bowman, April 17, 2024, page 46, lines 22-24.

> "As noted in CA-NP-004, Newfoundland Power does not collect data relating to customer willingness to pay. This has been an issue for many years in this jurisdiction"

What utilities collect data relating to customer willingness to pay in Canada? What utilities do not?

Reference: Pre-Filed Evidence of C. Douglas Bowman, April 17, 2024, page 48, lines 22-24.

"I note that in CA-NP-054c (relating to 2024 CBA), Newfoundland Power indicates that 226,000 customer accounts experienced no unplanned distribution-related outages at all in 2022."

Please confirm that in CA-NP-054 (1st Revision) related to its 2024 Capital Budget Application, Newfoundland Power corrected the referenced figure by clarifying that approximately 88,000 customers experienced no service interruptions greater than one minute during normal operating conditions but that those customers may have experienced outages due to loss of supply or major weather events.

NP-CA-039

NP-CA-040

NP-CA-041

Reference: Pre-Filed Evidence of C. Douglas Bowman, April 17, 2024,

page 49, lines 7-16.

Please provide the utilities Mr. Bowman is aware of that ask the questions provided by Mr. Bowman, including what they provide for "X", "Y", and "Z".

RESPECTFULLY SUBMITTED at St. John's, Newfoundland and Labrador, this 8th day of May, 2024.

NEWFOUNDLAND POWER INC.

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