## Q. <u>DISTRIBUTION</u>

DISTRIBUTION RELIABILITY INITIATIVE (POOLED), p. 45 of 81, \$3,114,000

## **PUB 16.0**

 Please give reasons why or why not the upgrade of Feeder BOT-01 should be considered a multi-year project.

 A. The response to Request for Information PUB 8.0 NP provides Newfoundland Power's general views on the presentation of proposed capital projects as Multi-Year Projects. In general terms, discrete projects for which the scope, nature and forecast cost is unlikely to change are appropriate for presentation as Multi-Year Projects, particularly where the value of expenditures in one year is dependent on the completion of work in a subsequent year.

The Distribution Reliability Initiative project included in the 2006 capital budget is comprised of the 7 distribution feeder upgrades outlined in Table 1 on p. 45 of 81. Three of the feeders require additional upgrading that is currently anticipated to be completed in 2007 (BOT-01, GLV-02 and LEW-02), including 2 feeders that also require further work that is currently planned for 2008 (BOT-01 and GLV-02).

The work proposed for the BOT-01 and GLV-02 feeders in 2006, 2007 and 2008, and the work proposed for the LEW-02 feeder in 2006 and 2007 has been sufficiently defined and planned such that material changes in the scope, nature and forecast cost are not likely. On that basis, these 3 feeder upgrades could potentially be considered as discrete Multi-Year projects.

 In Newfoundland Power's view, however, there is no compelling reason to consider these feeder upgrades as Multi-Year projects. The work planned for each of these feeders in specific years will provide reliability benefits to customers on the feeders regardless of the completion of the work planned for subsequent years. It is therefore not inappropriate to consider the individual annual components for each feeder on its own merits.

Furthermore, while Newfoundland Power's current capital expenditure plans include the completion of the subsequent components of work on the BOT-01, GLV-02 and LEW-02 feeders as indicated in the engineering reports 4.2.1, 4.2.2 and 4.2.3, the Company has chosen not to present the BOT-01, GLV-02 and LEW-02 feeder initiatives as Multi-Year Projects. This approach provides flexibility for subsequent years with respect to competing capital expenditure priorities that may arise as a result of changed or unanticipated circumstances.