Q. Page 1-5, lines 1-9: Please describe in detail the initiatives and the implementation cost for each that contributed to improved Newfoundland Power emergency preparedness and customer responsiveness.

A. A. Introduction

On January 11, 2013, an equipment problem at Newfoundland and Labrador Hydro's ("Hydro") Holyrood thermal generating station caused the plant to disconnect from the Island Interconnected System. This disturbance resulted in approximately 173,000 Newfoundland Power customers losing electrical service. Service was fully restored to customers by January 13, 2013.

Beginning on January 2, 2014, and lasting until January 8, 2014, Newfoundland Power customers incurred power outages as a result of continuing generation supply shortages and successive major electrical system disruptions on the Island Interconnected System. The generation supply shortages resulted in rotating power outages which caused as many as 33,529 customers to be without electricity at one time. The impact of the major electrical system disruptions resulted in as many as 187,501 Newfoundland Power customers being without electricity at one time.

Since the loss of supply on the Island Interconnected System in 2013 and 2014, Newfoundland Power implemented a number of initiatives to improve its emergency preparedness and customer responsiveness.

B. 2013 Initiatives

Newfoundland Power reassessed its customer service response to major electrical system outages following the electrical system events of January 11-13, 2013. This reassessment resulted in changes to customer service technology, overall outage response processes and human resource deployment.

Following the January 2013 outage, the customer service technology improvements included (i) a 25% increase in the Customer Contact Centre telephone line capacity; (ii) enhancements to the telephone system to facilitate more advanced message handling techniques; (iii) improvements to permit faster mobile phone access to outage information; and (iv) upgrades to the Company's website to improve customer access to outage related information.

39To improve the timeliness, accuracy and consistency of customer communications during40major electrical system events, Newfoundland Power established a team referred to as the41communications hub. The communications hub is comprised of operations, customer42relations, communications and information services employees. The communications

1 2 3	hub is responsible for the assembly, updating, and dissemination of outage status and restoration information to key employees. ¹
4	To increase the pool of employees available to communicate with customers throughout a
5	major electrical system event, the Company identified and trained additional employees
6	to provide service in the Customer Contact Centre. The pool of additional employees
7	identified included people who regularly work in human resources, finance, conservation,
8	regulatory, information services and audit functions.
9	
10	The implementation costs associated with the 2013 customer service technology
11	improvements described above were approximately \$40,000.
12	
13	C. 2014 Initiatives
14	
15	General
16	Following the events of January 2014, Newfoundland Power assessed (i) its customer
17	service technology, (ii) customer communications response and (iii) electrical system
18	performance, including that related to rotating power outages. ²
19	
20	Customer Service Technology
21	Newfoundland Power's customer responsiveness was improved in 2014 following the
22	January 2-8, 2014 generation supply shortages and successive major electrical system
23	disruptions on the Island Interconnected System. This was achieved, in part, through
24	customer service technology improvements.
25	
26	The customer service technology improvements initiated by Newfoundland Power in
27	2014 include (i) an SMS text messaging platform; (ii) an additional web server; (iii) load
28	balancing technology to share website traffic between web servers; (iv) website
29	enhancements; and (v) additional capacity improvements in the Customer Contact Centre
30	telephone system.
31	
32	The implementation costs associated with the 2014 customer service technology
33	improvements described above were approximately \$225,000.

¹ This includes information from Company sources, such as the Customer Contact Centre, System Control Centre and field operations. It also includes information gathered from a diverse array of external sources, including customers, Hydro, fire and emergency services, the Department of Transportation and Works, municipalities, critical suppliers, school districts and seniors' homes.

January 2nd, 2014 was the first time Newfoundland Power was required to conduct rotating power outages on a sustained basis to respond to a forecast generation shortfall on the Island Interconnected System.

³ Newfoundland Power commenced SMS text messaging and email notification service to customers for feederlevel outages in December 2014. The service is currently available via the Company's website. As of September 30, 2015, approximately 1,300 Newfoundland Power customers had subscribed to the service. As of December 16, 2015 the number of customers subscribing to the service has increased to approximately 8,230.

1 **Customer Communications** 2 Customer communications has also been improved by the introduction of the Advance 3 Notification Protocol and the Joint Storm/Outage Communications Plan which trigger 4 and guide customer communications activities in response to developing or existing 5 supply shortages or electrical system events on the Island Interconnected System.⁴ 6 7 The Advance Notification Protocol consists of five alert levels based on predetermined reserve margin thresholds.⁵ When each reserve margin threshold is breached, the 8 Advance Notification Protocol defines the actions to be taken by each utility, identifies 9 10 the customers and stakeholders to be notified and information to be provided. Decreasing 11 reserve margins call for increased customer communications, the eventual request for 12 customers to conserve energy, and ultimately, preparation for rotating power outages 13 should electrical load be expected to exceed available generation. 14 15 The Joint Storm/Outage Communications Plan provides communications teams from 16 Newfoundland Power and Hydro with coordinated strategies, tools and templates to assist 17 the utilities in determining the appropriate customer communications response during 18 anticipated or actual electrical system events. The goal of the Joint Storm/Outage 19 Communications Plan is to ensure coordinated and consistent information is 20 communicated from the utilities to customers so that customers are prepared in the event 21 of an outage. 22 23 The Advance Notification Protocol and the Joint Storm/Outage Communications Plan 24 were developed using Newfoundland Powers internal resources. The costs incurred to

were developed using Newfoundland Powers internal resources. The costs incurred
develop these initiatives were not incremental to the Company's operations.

⁴ Both the Advance Notification Protocol and Joint Storm/Outage Communications Plan were developed jointly with Hydro and require coordination between both utilities when circumstances on the Island Interconnected System warrant.

⁵ The Alert Levels include Alert 0 – Normal Conditions; Alert 1 – Power Advisory; Alert 2 – Power Watch; Alert 3 – Power Warning; and Alert 4 – Power Emergency.

1	Electrical System Improvements
2	Following the January 2-8, 2014 electrical system events, Newfoundland Power
3	identified a number of projects necessary to improve its electrical system flexibility and
4	resilience. ⁶ These projects improved the electrical system's ability to respond to both
5	major disruptions and local system events. The projects improved the system's ability to
6	deal with cold load pickup and improved efficiency of restoration activities following
7	outages. The projects also served to increase the reliability and capacity of the
8	Company's thermal generating plants. ⁷
9	
10	The transmission, distribution, and substation system improvements completed by
11	Newfoundland Power in response to the January 2-8, 2014 events include the following:
12	
13	(i) 14 downline automated distribution feeder sectionalizing reclosers,
14	(ii) upgrading of 4.3km of distribution feeder conductor,
15	(iii) 7 automated substation feeder reclosers, and
16	(iv) 2 automated transmission line breakers.
17	
18	These improvements expanded Newfoundland Power's ability to remotely manage
19	rotating power outages to a larger customer base, addressed a capacity constraint that
20	existed during the January 2-8, 2014 period, and reduced the risk of extended power
21	outages to customers serviced by a 138 kV transmission line in the Conception Bay North
22	area. The total cost of these projects was approximately \$2.6 million. ⁸
23	
24	Newfoundland Power's Wesleyville and Greenhill gas turbines provide approximately 30
25	MW of generating capacity to the Island Interconnected System. Both units required
26	capital improvements as a result of their relatively long time in service. In 2014
27	Newfoundland Power completed the following work in advance of the 2014/2015 winter
28	season:

⁶ Newfoundland Power's Application for *Electrical System Improvements, April 4, 2014* was approved by the Board in Order No. P.U. 14 (2014). The Company's Application for *Thermal Generation Refurbishment, June 2014* was approved by the Board in Order No. P.U. 24 (2014).

⁷ Cold load pickup is simply the additional electrical demand which presents itself when a disconnected feeder is reconnected. The electrical demand which can be expected upon reconnection will be higher than that which existed at disconnection. This is the result of a lack of diversity of demand at the time of reconnection. Prior to disconnection, a distribution feeder normally has a degree of diversity (randomness of electrical devices on at a given time). When that distribution feeder is disconnected and later reconnected, or "picked up", this diversity is lost (all electrical devices are on at the moment of reconnection). This serves to increase the demand on the feeder at the moment of reconnection from what it was at the moment of disconnection.

⁸ A detailed explanation of each of the system improvements is described in detail in the report *Electrical System Improvements, April 4, 2014* filed in relation to the Company's April 4, 2014 application for approval of a capital expenditure supplemental to Newfoundland Power's 2014 Capital Budget.

1	Wesleyville Gas Turbine
2	(i) Complete overhaul of the Rolls Royce AVON gas generator,
3	(ii) Refurbishment of the power turbine including replacement of insulating
4	blanket and weld repairs to the power turbine disc and shroud,
5	(iii) Replacement of the automatic voltage regulator,
6	(iv) Minor repairs to the building roof, and
7	(v) Replacement of the lubricating oil cooler.
8	
9	Greenhill Gas Turbine
10	(i) Refurbishment of the power turbine including replacement of the insulating
11	blanket and repairs to the power turbine labyrinth seal and replacement of the
12	inlet housing shroud,
13	(ii) Replace exhaust gas thermocouple wiring harness,
14	(iii) Minor repairs to the building enclosure, and
15	(iv) Installation of a new 100,000 litre fuel tank and associated piping.
16	
17	Refurbishment of the Company's Wesleyville and Greenhill gas turbines helps to ensure
18	Newfoundland Power's thermal generating assets are available to support peak demand
19	on the Island Interconnected System in the near term. The total cost of these projects was
20	approximately \$1.7 million. ⁹

⁹ A detailed explanation of each of the system improvements is described in detail in the report *Thermal Generation Refurbishment, June 2014* filed in relation to the Company's June 16, 2014 Application for approval of a capital expenditure supplemental to Newfoundland Power's 2014 Capital Budget.