

1 **Q. In the executive summary (page 1) it is stated:**

2  
3 *“The overall recommendation arising from the review is that Newfoundland Power*  
4 *should formalize and deepen its examination of CSS modernization options to include*  
5 *a thorough evaluation of the costs and benefits of replacement and deployment options.*  
6 *In addition, Newfoundland Power should develop contingency plans for CSS support*  
7 *and training to mitigate any unexpected loss of key personnel over the next five years.”*  
8 (emphasis added)  
9

- 10 a) **At the time of its study did EY believe that the existing CSS could operate**  
11 **satisfactorily until at least 2028 provided NP implemented a contingency plan**  
12 **for CSS support and training to mitigate the unexpected loss of key**  
13 **personnel?**  
14
- 15 b) **Did EY have a vested interest in recommending that NP “formalize and**  
16 **deepen its examination of CSS modernization options to include a thorough**  
17 **evaluation of the costs and benefits of replacement and deployment options”**  
18 **given its expertise in this area and the fact that it would be allowed to bid on**  
19 **this work?**  
20
- 21 c) **Did EY gain verification from Newfoundland Power that it would not be**  
22 **disqualified from bidding further work relating to this project as a condition**  
23 **of its bid on the risk assessment assignment?**  
24
- 25 d) **Was there any understanding, implicit or explicit, between EY and NP that**  
26 **EY would get additional work from NP following its initial recommendation**  
27 **to NP?**  
28
- 29 e) **The Agreement between EY and NP to do the study was dated April 20, 2018**  
30 **and the work was to be completed between April 16, 2018 and May 16, 2018**  
31 **– a thirty day period.**
- 32 (i) **How did EY do the analysis required in just a thirty day period?**  
33
- 34 (ii) **Would that be the normal timeframe in EY’s experience in dealing**  
35 **with other utilities when attempting to launch a capital budget**  
36 **expenditure project?**  
37
- 38 (iii) **In that thirty day period, how often did EY meet with representatives**  
39 **of NP pertaining to this matter and did EY provide NP a draft of its**  
40 **final report dated June 2018 prior to finalizing the report? What**  
41 **revisions, if any, did NP suggest to any such draft?**  
42
- 43 (iv) **Has EY, upon engagement by a utility, encountered similar**  
44 **timeframes when a utility is attempting to upgrade or replace a**  
45 **customer service system and can EY cite examples of the same?**

- 1 A. a) No, it was not part of EY's scope to assess whether the existing CSS could  
2 operate satisfactorily until at least 2028 provided NP implemented a contingency  
3 plan for CSS support and training. EY's scope included assessing five risk  
4 dimensions facing CSS in 2018 and how those risks were forecast to change over  
5 the next 5 to 10 years.  
6
- 7 b) No.  
8
- 9 c) No.  
10
- 11 d) No.  
12
- 13 e) (i) The 2018 scope of work was achievable within the time period noted.  
14  
15 (ii) The timeframe noted is reflective of the 2018 scope of work. Clients and  
16 the assistance we provide vary greatly based on numerous factors and the  
17 scope of work agreed upon.  
18  
19 (iii) Generally, it is a standard practice to meet with clients throughout the  
20 course of an engagement to plan, discuss status, resolve issues, and collect  
21 and validate data. It is equally a standard practice to share draft reports  
22 with clients prior to issuing a final report.  
23  
24 Newfoundland Power objects to the additional detail requested in this  
25 question as it is not necessary for a satisfactory understanding of the  
26 matters to be considered in this Application as required by Section 14 of  
27 the *Board of Commissioners of Public Utilities Regulations, 1996*.  
28
- 29 (iv) Refer to CA-NP-166 (e) (ii).  
30  
31 (iv) Refer to CA-NP-166 (e) (ii).