

1 **Q. Reference: “2021 Capital Budget Application,” Newfoundland Power, July 9, 2020,**
2 **Volume 1, Schedule B, Rebuild Distribution Lines (Pooled) at p. 45–47.**
3

4 **Over the past ten years, how much of Newfoundland Power’s distribution system**
5 **has been rebuilt? Please provide response in both kilometres and percentage of total**
6 **distribution.**
7

8 A. Distribution infrastructure is replaced through multiple capital projects. In addition to the
9 *Rebuild Distribution Lines* project, infrastructure component or line section replacement
10 takes place in the *Reconstruction, Relocate/Replace Distribution Lines for Third Parties,*
11 *Trunk Feeders, Feeder Additions for Load Growth* and *Distribution Reliability Initiative*
12 projects.¹
13

14 Some of these projects may involve the rebuilding of complete sections of line.
15 However, much of the work involves the replacement of specific line components. These
16 projects are therefore not conducive to translation into total kilometres of line rebuilt or
17 percentages of the total distribution system.
18

19 Based on pole removal data only, the Company estimates that it has completely rebuilt
20 less than 400 kilometres, or approximately 4%, of distribution line over the past 10
21 years.² This includes rebuilds completed across all capital projects listed above.

¹ The *Rebuild Distribution Lines* project is not dedicated to the rebuilding of distribution lines as the name suggests. *Rebuild Distribution Lines* projects are preventative capital maintenance projects that consist of either the complete rebuilding of deteriorated distribution line *sections* or the selective replacement of various line *components* based on inspections of the distribution line or engineering reviews. This typically includes the replacement of poles, crossarms, conductor, cutouts, surge/lightning arrestors, insulators and transformers.

² Newfoundland Power operates approximately 10,000 kilometres of distribution line (400 / 10,000 = 0.04, or 4%).