

1 **Q. [Production Life] – Please state whether the Company believes it provides inferior**  
2 **maintenance for its generating facilities compared to other electric utilities that also**  
3 **operate the same type of generating facilities. If the response is affirmative, identify**  
4 **each and every maintenance practice that the Company employs that it believes is**  
5 **inferior to other electric utility companies. Further, provide all support and**  
6 **justification for such practice..**

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8 A. The Company does not believe it provides inferior maintenance for its generating  
9 facilities. The level of availability of the Company's generating facilities for the past 10  
10 years, as shown in response to Request for Information CA-NP-021, would not suggest  
11 the Company provides inferior maintenance.

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13 Newfoundland Power's fleet of generating facilities is comprised of a mixture of legacy  
14 hydroelectric, older thermal and mobile generation which is atypical for the Canadian  
15 electric utility industry. This makes it difficult to draw comparisons with other Canadian  
16 utilities from a system perspective. The Company has not completed a study of the  
17 detailed maintenance practices of other electric utilities that also operate the same type of  
18 generating facilities, and so has no basis for a direct comparison of individual  
19 maintenance practices as requested.