

1 **Q. [Data] – Please identify each separate program initiated within the last 20 years that**
2 **takes a proactive step towards the inspection and preventative maintenance of the**
3 **Company’s assets. For each such program, identify what activities are performed,**
4 **which accounts are affected, and how each account is affected. Finally, provide all**
5 **workpapers, assumptions, considerations, and all material reviewed and/or relied**
6 **upon in support of the response.**

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8 A. This request is overly broad and unfocussed. Newfoundland Power objects to the
9 production requested on the basis that (i) it is insufficiently specific and (ii) in the
10 circumstances, not necessary for a satisfactory understanding of the matters to be
11 considered on this Application, all as required by Section 14 of the *Board of*
12 *Commissioners of Public Utilities Regulations, 1996*.

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14 For example, the production of “...all work papers, assumptions, considerations, and all
15 material reviewed and/or relied upon ...” in respect of *each program* initiated towards the
16 inspection and preventative maintenance of all of an integrated operating utility’s assets
17 *over a 20 year period* is impractical and incapable of response within a reasonable
18 timeframe. The request appears to Newfoundland Power to be nothing more than a
19 fishing expedition. Response to this Request for Information is clearly not necessary to
20 understand the issues before the Board on this Application.

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22 If the Consumer Advocate requires disclosure of specific matters or production of
23 specific documents, then he should indicate the *specific* matter and/or *specific* documents
24 in his requests for information.