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1    Q.    **Volume III, Tab 30 – Replace Vehicles and Aerial Devices**

2           Comparing Table 1 and Table 2 on page 2, does Hydro have an explanation as to  
3           why its kilometer criteria for light duty vehicles are not in line with two out of the  
4           three other Atlantic electric utilities?

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7    A.    Hydro's age criteria are in line with or exceed the criteria for replacement when  
8           compared to the other Atlantic Canadian Utilities. Hydro's kilometer criterion is in  
9           line with one Atlantic Canadian Utility. The kilometer criterion is not in line with the  
10          other two Atlantic Utilities for the following reasons:

11          a.    Primarily, Hydro's fleet is utilized more frequently than the Atlantic  
12               Canadian comparators on rural and remote roads that are not paved or are  
13               in poor condition. For example, Hydro employees travel on many woods  
14               roads to access lines as well as the Trans Labrador Highway.

15          b.    Additionally, due to the rural nature of Hydro's service area, when  
16               compared with the other Atlantic Canadian service areas, Hydro has a  
17               smaller network of dealer repair shops that have the tooling and expertise  
18               to maintain the fleet. This can result in a variance in maintenance quality.  
19               There are times when service must be obtained locally, but the local repair  
20               shops in many areas of Hydro's service territory are not equipped with the  
21               tools and equipment required to diagnose and maintain the vehicles we use.