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Q. Assuming the reliability standard applies to distribution feeders, would the same reliability standard apply to each distribution feeder within Newfoundland Power's service territory? If not, on what basis does Mr. Bowman propose to establish different reliability standards for different distribution feeders?

 A. Mr. Bowman recommends (page 38, lines 13 – 17 of his Pre-filed Evidence) that development of the standard be a tri-party effort, led by Newfoundland Power with input and review by Newfoundland and Labrador Hydro and the Consumer Advocate. Therefore, he is open to different proposals. However, he acknowledges that it is neither possible nor desirable from a cost perspective to achieve the same level of reliability for each feeder on the system; some feeders have very low customer densities and are located in remote, hard to access, regions. At the same time, "The policy of the province as set out in the *Electric Power Control Act, 1994* (the "Act") requires, in effect, that customers should have equitable access to power and should pay the lowest possible cost consistent with reliable service" (CA-NP 69, lines 20-23). This suggests that all customers should receive some minimum level of service reliability.

Mr. Bowman points out that it is common to have different benchmarks for different jurisdictions. As stated on page 34, footnote 11, "Current SAIDI benchmarks in Delaware are 295 minutes per customer for Delmarva which serves primarily urban areas and 635 minutes per customer for Delaware Electric Cooperative which serves primarily rural areas. Mr. Bowman believes there should be a minimum performance indicator related to individual feeders that if not met, would require an explanation of why the target has not been met with proposed corrective measures, and if the utility does not believe corrective measures are necessary, it should be required to explain why. In either case, the recommendation should be subject to the Board's approval. Use of CELID and CEMI indices as discussed in NP-CA 11 might provide a useful basis for addressing individual customer/feeder reliability performance.