Q. Has Newfoundland Power formally considered the cost versus the reliability improvement of implementing a proactive 4-5 year cycle preventive vegetation management program conducted by contractors? If yes, explain the analysis completed. If not, why not?

A. Newfoundland Power considers its current vegetation cycle to be effective.[1] Under normal operating conditions, excluding the impact of *significant events,* less than 3% of power interruptions experienced by Newfoundland Power's customers are attributable to tree contact.

During significant events, particularly severe wind storms, trees can come into contact with distribution lines. The issue during these significant events is principally with trees maintained for aesthetic reasons or danger trees located away from the right of way. Vegetation management associated with this type of tree will not be improved by reducing the cycle duration. Rather the issue is with obtaining the necessary consent to trim or cut these trees from their respective property owners.

Newfoundland Power's current vegetation program effectively maintains a reasonable balance between cost and reliability. Reducing the cycle duration will considerably increase cost with minimal potential gain in reliability.[2]

Newfoundland Power continues to work with its customers to reasonably balance reliability with the needs of its customers with respect to trees maintained for aesthetic reasons and danger trees located off the right of way.

[1] Under the Company's current Distribution Inspection and Maintenance Practices, provided as Attachment A to the response to Request for Information PUB-NP-067, a distribution line shall have a vegetation inspection completed twice every seven years. The inspection is completed as part of the distribution line ground inspection every seven years, and as a drive by inspection once in between.

[2] For example, a 50% reduction in power interruptions attributable to tree contact will only have a 1% improvement in overall reliability.