Q. (CA-NP-22) Did Liberty consider the "value" that customers place on increased reliability when undertaking its study?

4 Newfoundland Power cannot confirm whether or not "the value that customers place on A. 5 increased reliability" was considered by the Liberty Consulting Group ("Liberty") in its 6 Report on Island Interconnected System to Interconnection with Muskrat Falls 7 Addressing Newfoundland Power. However, Newfoundland Power observes that Liberty 8 identified opportunities and made recommendations to improve reliability for customers 9 in its report. These included installing additional downstream reclosers, increasing the priority of the *Rebuild Distribution Lines Project*, and a renewed effort to improve the 10 reliability of the Company's worst performing distribution feeders.¹ Projects relating to 11 these recommendations have been included in subsequent capital budget applications 12 which have been approved by the Board.² 13

¹ See Liberty's *Report on Island Interconnected System to Interconnection with Muskrat Falls Addressing Newfoundland Power*, December 17, 2014, pages 22-23.

² For example, in Order No. P.U. 40 (2014) the Board approved \$863,000 in relation to improving reliability of the Company's worst performing feeders and \$160,000 for additional downstream reclosers.