1 2 3 4 5 6 7 8 9 10 11 12	Q.	(R " <i>M</i> <i>in</i> <i>N</i> a) b) c)	eference Application, 2024 Capital Budget Overview, page 8) It is stated While overall levels of service reliability are viewed as acceptable, customers certain areas experience service reliability that is considerably below ewfoundland Power's corporate average." Is it inevitable that some customers have reliability that is below "average"? Do some customers have reliability that is well above average? Is it fair for customers receiving reliability that is average or below average to subsidize customers who are receiving reliability that is above average? How many customers experienced no distribution-related service outages in 2022?
13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Α.	a)	Newfoundland Power measures system reliability using the System Average Interruption Duration Index ("SAIDI") and the System Average Interruption Frequency Index ("SAIFI"). SAIDI and SAIFI represent the average reliability experienced by customers. As such, it is inevitable that some customers will have reliability that is above and below the average value. ¹
		b)	The question implies that the cost to serve customers with below average reliability is lower than the cost to serve customers with higher than average reliability. In Newfoundland Power's view, there is not a direct relationship between customer reliability and the cost to serve a customer. For example, a customer in a rural area may experience below average reliability and be costlier to serve than a customer in an urban area with above average reliability by virtue of geography, population density, and the nature of the transmission system serving those customers. Newfoundland Power is required to provide customers with equitable access to an adequate supply of power. ² One way the Company achieves this is through the Distribution Baliability to the transmission between the impressed and the cost of the transmission achieves the service of the transmission between the transmission achieves the service the transmission between the provide the transmission between the transmission achieves the service the transmission between the provide the transmission between the provide the transmission between the transmission between the provide transmission between the transmission between the provide transmission between transmission between the provide transmiss
29 30 31 32 33 34		c)	<i>Distribution Reliability Initiative</i> which aims to improve service reliability to Newfoundland Power customers supplied by feeders with service reliability considerably below average. ³ In 2022, approximately 88,000 customers experienced no service interruptions greater than one minute during normal operating conditions. ⁴

¹ The *average* is a number expressing the central or typical value in a set of data. In this case it is the mean, which is calculated by dividing the sum of the values in the set by their number.

² See the *Electrical Power Control Act, 1994*, SNL 1994, c. E-5.1, s. 3(b)(ii).

³ See Newfoundland Power's *2024 Capital Budget Application*, report *1.1 Distribution Reliability Initiative*. See also, the response to Request for Information CA-NP-064.

⁴ These customers may have experienced outages due to loss of supply or major weather events, or momentary interruptions of duration less than one minute. There may be other customers who did not experience a distribution-related outage. Newfoundland Power is unable to separate service outages by Distribution, Substations or Transmission on an individual customer basis.