

- 1 **Q. (Reference Application, 2024 Capital Budget Overview, Table 3, page 12)**  
 2 **a) Why is a comparison to the Atlantic Canada utilities appropriate?**  
 3 **b) Please reproduce Table 3 showing a broad range of distribution companies**  
 4 **across Canada, e.g., Electricity Canada Region 2 utilities as listed in footnote**  
 5 **11 on page 7.**

- 6  
 7 A. a) The Provisional Guidelines require Newfoundland Power to provide benchmarking  
 8 against similar utilities.<sup>1</sup> To meet this requirement, Newfoundland Power has  
 9 provided reliability information for Electricity Canada Region 2 utilities along with  
 10 capital investment and service reliability information for the other Atlantic Canadian  
 11 utilities.

12  
 13 Newfoundland Power recognizes there are differences between the four Atlantic  
 14 Canadian utilities with respect to number of customers, service territory and  
 15 electricity system configuration. However, the geography and climatic conditions are  
 16 more similar between the Atlantic provinces than central and western Canada. For  
 17 example, hurricanes and hurricane force winds are more commonly experienced in  
 18 Atlantic Canada than elsewhere in Canada. Additionally, all four Atlantic Canadian  
 19 utilities serve a mix of urban and rural customers. As such, Atlantic Canadian  
 20 utilities are most comparable to Newfoundland Power than other Region 2 utilities.

- 21  
 22 b) Electricity Canada Region 2 utilities comprises 19 different utilities from throughout  
 23 Canada.<sup>2</sup> The reliability data used by Newfoundland Power related to other utilities  
 24 is obtained from databases maintained by Electricity Canada. Electricity Canada  
 25 does not track property, plant and equipment investments for Region 2 utilities. As  
 26 a result, Newfoundland Power does not have the transmission and distribution  
 27 property, plant, and equipment data for the Electricity Canada Region 2 utilities for  
 28 period 2012 to 2021.

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<sup>1</sup> See the Provisional Guidelines, page 9 of 18.

<sup>2</sup> The Electricity Canada Region 2 utilities include Canadian utilities that serve a mix of urban and rural markets. These are ATCO Electric, BC Hydro, FortisAlberta, FortisBC, Hydro One, Hydro-Québec, Manitoba Hydro, Maritime Electric, NB Power, Newfoundland and Labrador Hydro, Newfoundland Power, Newmark-Tay Power Distribution, Nova Scotia Power, Northwest Territories Power Corporation, SaskPower, Elexicon Energy, Waterloo North Hydro, ATCO Electric Yukon and Yukon Energy.

- 1 Table 1 provides a comparison of service reliability of Newfoundland Power to the  
2 average of Electricity Canada Region 2 utilities.

Table 1 Electricity Canada Region 2 Utilities Service Reliability (2012-2021)		
Utility	SAIDI	SAIFI
Newfoundland Power	2.7	1.9
Electricity Canada Region 2 Utilities	4.3	2.1