

1 **Reference: 3.1 2024 Transmission Line Rebuild**

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3 **Q. Page 8. It is stated that while the historical reliability performance of**
4 **Transmission Line 146L has been reasonable, the sub-standard design and**
5 **deteriorated condition exposes it to increased probability of failure going**
6 **forward. In Newfoundland Power’s opinion what weight should historical**
7 **reliability performance be given in the evaluation of whether a transmission**
8 **line should be upgraded or deferred or is the condition assessment the only**
9 **consideration?**

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11 A. Historical reliability of transmission lines is not regularly used by Newfoundland Power in
12 the evaluation of whether a transmission line requires a rebuild. In Order No. P.U. 38
13 (2022), the Board agreed, stating:

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15 *The Board does not take past reliability performance as evidence of*
16 *future reliability performance, especially in light of the evidence showing*
17 *the deteriorated condition of the line.*¹

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19 Reliability indices are lagging indicators that encompass historical issues on the electrical
20 system. Waiting for reliability on the transmission system to degrade before
21 undertaking capital upgrades would result in a poor quality of service being experienced
22 by large numbers of customers for several years. Such an approach would not
23 recognize the criticality of transmission lines in serving customers and would be
24 inconsistent with the provincial power policy.

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26 Newfoundland Power inspects and maintains its transmission lines annually in
27 accordance with the Company’s *Transmission Inspection and Maintenance Practices*.
28 The trend in the observed number of TD4 deficiencies, which require capital planning
29 intervention, is another key indicator used by the Company to determine if a
30 transmission line should be upgraded or if capital work can be deferred.²

¹ See Order No. P.U. 38 (2022), page 15, lines 24 to 26.

² For additional details on the categories of deficiencies, see Newfoundland Power's *2024 Capital Budget Application*, report *3.1 2024 Transmission Line Rebuild*, page 3.