

1 **Q. (Reference CA-NP-072e)**

2 **It is stated "It is Newfoundland Power's position that a less resilient and**  
3 **reliable system would be more expensive for customers, as increased**  
4 **equipment failures during weather events would result in additional overtime**  
5 **labour costs to complete repairs in a reactive, unplanned fashion." Please file**  
6 **documentation supporting this "position".**

7  
8 **A.** Please refer to the following documentation:

- 9
- 10 • Newfoundland Power's *2025 Capital Budget Application, 2025 Capital Budget*  
11 *Overview, Section 2.3 – Balancing Cost and Service*, page 5.
  - 12 • The responses to Requests for Information CA-NP-015, CA-NP-064, and CA-NP-  
13 071.
  - 14 • Newfoundland Power's *2025/2026 General Rate Application* (the "2025/2026  
15 GRA"), Newfoundland Power Rebuttal Evidence, May 28, 2024, Section 4.5.1 –  
16 Reliability.

17  
18  
19  
20 In addition, please see the response to Request for Information NP-CA-038 in relation to  
21 the 2025/2026 GRA wherein the Consumer Advocate's expert, C. Douglas Bowman,  
22 stated:

23  
24 *A utility is required to maintain its asset base. If it fails to do so, there will*  
25 *be increased risk of injury to the public and utility staff, increased risk of*  
26 *environmental degradation, increased operating and maintenance costs,*  
27 *and a decline in reliability performance. Depending on the situation, the*  
28 *cost to replace or refurbish an asset might be exceeded by the increase in*  
29 *operating and maintenance cost if the asset is not replaced or*  
30 *refurbished...*