

1 **Q. In reference to the evidence of Earl Ludlow, page 31, line 23, wherein it is stated,**
2 **“In some instances, the below average reliability was a result of the patterns of**
3 **construction and rebuilding of the electrical system that took place prior to the early**
4 **1990s.” Please provide the dates prior to the early 1990s which is the reference**
5 **point to this statement and please provide the name of the company or contractor**
6 **responsible for the patterns of construction and rebuilding of the electrical system**
7 **which resulted in below-average reliability.**

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9 A. The statement on page 31 of the pre-filed evidence of Mr. Earl Ludlow refers to the fact
10 that prior to the early 1990s, portions of the distribution system (in some cases entire
11 feeders) were upgraded as a matter of course in response to customer and load growth.
12 Other areas experienced little or no growth for prolonged periods and, correspondingly,
13 there was no perceived requirement to upgrade those feeders. This pattern of
14 construction resulted in the average age of lines and equipment being much greater for
15 areas of low load growth than was the case for feeders located in and around growth
16 centres. This, in turn, had implications for the reliability of many older rural feeders
17 relative to other feeders that had been upgraded.

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19 The statement on page 31, line 23 does not refer to any particular dates prior to the early
20 1990s, nor does it refer to any specific feeders, locations, company or contractor.