

**Q. DISTRIBUTION**

**PUB 29.0 (RE: B-31, B-35, B-41, B-44, B-47, B-49, B-51)**

**PUB 29.1**

**Provide the number of feeders upgraded in the last five (5) years.**

A. Newfoundland Power's use of the term "feeder upgrade" typically refers to specific projects that are planned and are directed at improving performance or the condition of a feeder. By contrast, incidental upgrade to a feeder that is responsive to emergency circumstances or that would occur, say, as a result of an extension to serve new customers is typically not considered by the Company to be a "feeder upgrade".

A total of 89 feeders have been upgraded in the past five years (including feeders in the process of being upgraded in 2004), and have been included in the Rebuild Distribution Lines (B-44), Distribution Reliability Initiative (B-49) or Feeder Additions & Upgrades to Accommodate Growth (B-51) capital budget projects.

Although an element of upgrading occurs in the work carried out under the Extensions (B-31), Services (B-35), Reconstruction (B-41) and Relocate/Rebuild Distribution Lines for Third Parties (B-47) capital budget projects, Newfoundland Power does not consider this work as a "feeder upgrade". For Extensions, Services and Relocate/Rebuild Distribution Lines for Third Parties, the work is principally directed at specific customer or third party requirements. For Reconstruction, the work is principally directed at repairs to reinstate damaged equipment or high priority requirements that should not be deferred to the next budget year.