Q. <u>SUBSTATIONS</u>

DISTRIBUTION SYSTEM FEEDER REMOTE CONTROL (POOLED), p. 19 of 81, \$779,000

PUB 8.0 Why does the Company not consider this a multi-year project?

A. The Provisional Capital Budget Application Guidelines dated June 2, 2005 (the "Guidelines") provide for the application for capital expenditure approval of Multi-Year Projects, whereby a project that is expected to extend beyond a single year would be approved on initial review, and subject to additional review only where there is a material change in the scope, nature or forecast cost of the project. The Guidelines contemplate Multi-Year Projects where the scope, nature and forecast cost of each annual component of the project can be reliably determined in advance of the request for approval.

In Newfoundland Power's view, a typical request for Board approval of a Multi-Year Project would involve a discrete project, such as the complete refurbishment of a hydroelectric generating plant, where planning of the total project has been completed in advance of the request for approval. In such circumstances, the scope, nature and forecast cost is less likely to change following the Board's review.

Further, such projects often require the completion of work in subsequent years before certain components of plant and equipment acquired or constructed in prior years can be put into useful service. Where the value of capital expenditures in a prior year is materially dependent on expenditures in a subsequent year, it is appropriate that the multi-year expenditures be considered together.

Distribution System Feeder Remote Control is not a discrete project. Rather, it is an ongoing program of capital expenditures for the replacement of older technology relays and reclosers which is expected to be included in Newfoundland Power's annual capital budgets for the foreseeable future. The annual expenditure requirements for such programs may vary with changing circumstances. Unanticipated developments affecting the electrical system, changes in technology and pricing, and competing demands on Newfoundland Power's resources may alter the Company's capital expenditure priorities and modify the requirements for expenditures on certain programs from year to year.

The value of the annual expenditures on programs such as Distribution System Feeder Remote Control is not typically dependent on expenditures in future years. In the case of Distribution System Feeder Remote Control, the benefits of the expenditures for the automation of the selected feeders in one year accrue commencing in that year, and do not depend on the automation of other components of the electrical system in subsequent years.

1	While it is conceivable that Newfoundland Power could seek a multi-year approval of
2	ongoing expenditure programs such as Distribution System Feeder Remote Control, the
3	Company believes it is most practical to present the annual components of the project
4	separately for the Board's review.