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- (Reference Application Schedule B, Reconstruction, page 40) It is stated "The Reconstruction program is required to provide safe and reliable service to customers at the lowest possible cost as it permits the timely correction of high-priority deficiencies on the distribution system that result in customer outages and unsafe operation of the electrical system." Why is this project needed to provide reliable service when Newfoundland Power's reliability performance is better than the Canadian average? Please file evidence that Newfoundland Power will be unable to provide reliable service at least cost if it were to delay this project.
 - The *Reconstruction* program is a corrective maintenance program that involves the replacement of distribution structures and equipment that has failed or is at imminent risk of failure. The program addresses high-priority deficiencies that are identified during inspections or recognized during operational problems, including trouble calls from customers. As examples, the *Reconstruction* program includes the replacement of distribution poles that have been broken during vehicle accidents and severe storms. Such damage results in customer outages and safety hazards for the general public. There is no alternative to repairing these deficiencies in a timely manner as any delay would result in unsafe and unreliable operation of the electrical system.