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Witness: Lavelle A. Freeman and Elli Ntakou
Request from: Office of Consumer Counsel

Question:

Refer to Exhibit CLP-TSP-3, at p. 7. The Company states that the Sustained tier maintains current reliability at minus 0.7 minutes of SAIDI, and that the Targeted System Performance tier improves performance by 6.1 minutes. Provide the calculation that produces the 6.1 minutes, identify the programs credited with the improvement, and state the SAIDI benefit assigned to each.

Response:

The SAIDI improvement is attributable to the following programs:

Programs	**Sustained Performance**	**Targeted System Performance**
RELIABILITY IMPROVE SPEC PROJ	-4.7	-8.9
SMART SWITCHES PROGRAM	-9.2	-10.4
Capital Improvement Total	-14	-19.3
- Vegetation Improvement	-2.3	-2.3
+ System Degradation	15.6	15.6
Net Impact to SAIDI	-0.7	-6.1

Actual SAIDI improvements will vary based on a number of factors and minor storm events occurring within a given year and the pace at which aging infrastructure impacts system reliability.

In the year that the reliability upgrades are implemented, reliability performance will continue to be a function of the type of circumstances experienced by the system in that year (emergent work, pole hits, storm impact, asset failures and other circumstances). Reliability benefits will not necessarily be experienced immediately upon implementation of the reliability upgrade, as the benefit of these investments accrue over the lifetime of the asset. In addition, historical events cannot be assumed to repeat themselves in the same location. For example, capital improvements may be performed in one section of an overhead line where historical events have occurred, however those events may not recur at that location, or may occur again at a location downstream of the new plant addition in the future. For this reason, ReBOT utilizes historical outages that recur more frequently, indicating a concurrence of issues and a higher probability of recurrence, rather than focusing on large, isolated events.