Q. Ref: Direct Testimony of John Roberts, p. 1, lines 10-12. Does Hydro use a system reliability target when assessing its capital program? If so, what is the reliability target and how is that target index monitored in relation to specific capital projects as well as the capital program overall?

A. Hydro does establish annual reliability targets related to delivery point performance and underfrequency load shedding events on an overall system basis. These may be used when assessing the capital program, however, typically it is through the analysis of various lines and plants that the "worst performers" are identified. These analyses also indicate what the root problems are and form the basis for the justification of specific capital projects.