

1 Q. **RE: p. B-139** Provide particulars of any failures or other demonstrated
2 unreliability of the flooded and non-flooded battery systems for each site.

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5 A. There have not been any failures of the battery systems at these sites.
6 However, when required all battery systems have to be reliable because they
7 serve as an uninterruptible power source for critical processes and systems
8 within Hydro's infrastructure to ensure overall reliability of supply to our
9 customers.

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11 Hydro's decision on replacing their battery systems is based on a
12 combination of age, observation and testing. Based on Hydro's experience,
13 these systems are at the end of their useful life and need to be replaced to
14 ensure overall reliability of service to customers.