Construction of New Diesel Plant, p. B-78, \$2,226,500

Q. Please provide a copy of any cost/benefit studies or other documentation that supports the decision to overhaul an engine no more than five times.

A. Hydro does not complete any cost/benefit studies related to the decision not to overhaul an engine more than five times. The criteria that triggers the review for replacement is the 120,000 hours and the five overhauls. As this point is approached, the condition of the unit is evaluated on the basis of such things as lube oil consumption, fuel consumption, parts costs and availability and labor costs. All this is combined with the manufacturer's recommendation and the general condition of the unit and the decision to replace is confirmed.

Hydro's experience has determined that it is not effective to overhaul an engine more than five times, or run the unit for more than 120,000 hours. Some Canadian utilities have no formal replacement program or criteria while other's criteria range from a low of 66,000 hours to a high of 100,000 hours with no criteria on the number of overhauls. None of the utilities use cost/benefit analysis to determine overhaul limits or replacement times.