Q. GENERATION - HYDRO

Rattling Brook Hydro Plant Refurbishment (Clustered) - \$18,242,000

PUB 5.0 NP

Since the incremental cost of replacement energy that would be incurred in the event of a catastrophic failure would not have been included in test year costs, how would Newfoundland Power Inc. plan to deal with such additional costs?

A. 1.0 General

In the normal course, Newfoundland Power does not create plans to deal with the cost consequences of catastrophic engineered facility failure. Prudent engineering practice indicates that catastrophic failure is unacceptable and should be avoided by appropriate asset management practice.

It is Newfoundland Power's position that appropriate asset management practice indicates that the Rattling Brook Refurbishment Project should proceed in 2007.

2.0 Costs

The Rattling Brook hydroelectric plant is Newfoundland Power's largest energy producing facility.

Please refer to the Response to PUB-4.0 NP for an indication of the possible costs associated with a catastrophic failure of Rattling Brook plant.

3.0 Possible Replacement Energy Costs Recovery

If, as a result of a catastrophic failure of the Rattling Brook plant, Newfoundland Power experienced an increase in its power supply costs which jeopardized its ability to recover all of its prudently incurred costs, the Company would be practically required to apply to the Board for relief.

In 1984, Newfoundland Power's system was exposed to a severe sleet storm giving rise to extraordinary costs not contemplated in setting electricity rates. In Order No. P.U. 37 (1984), the Board authorized Newfoundland Power's recovery of the extraordinary operating costs related to this storm over a 4 year period from 1984 through 1987.

In the event Newfoundland Power experienced extraordinary costs resulting from a catastrophic failure at the Rattling Brook hydroelectric plant, an application to the Board for relief would be a possible course Newfoundland Power would undertake to recover those costs.