1	Q.	Reference: Supply Cost Deferrals 2015, 2016 and 2017 Application Evidence, Page
2		4, lines 20-23.
3		
4		Through its investigation and summary report following the March 4, 2015 Avalon
5		Voltage Collapse events, Liberty commented on Hydro's then lack of reliability
6		culture and failure to plan for contingency events. Furthermore, Liberty indicated
7		that Hydro has a "non-standard industry thinking associated with reliability.
8		
9		Please confirm that in its October 22, 2015 Review of the Newfoundland and
10		Labrador Hydro, March 4, 2015 Voltage Collapse Liberty Consulting did not
11		specifically recommend the use of standby and emergency generation in the
12		manner ultimately implemented by Hydro.
13		
14		
15	A.	Liberty Consulting's Review of the March 4, 2015 Voltage Collapse
16		recommendations were as follows:1
17		1. Hydro should assign a team to implement a program to establish a more
18		robust operational philosophy regarding reliability.
19		2. Hydro should enhance the skills and capabilities it brings to reliability
20		engineering and analysis.
21		3. Hydro should take steps to assure situational awareness among operators
22		and others who need the information to respond promptly and ably to
23		adverse system conditions.
24		4. Hydro should implement a more robust approach to the CERP.

 $^{^{\}rm 1}$ Liberty Consulting's Review of the March 4, 2015 Voltage Collapse, Pages 10 and 11.

1	5. Advance Notification Protocols should appropriately identify potential
2	impact in terms of the loss of power to customers.
3	
4	Specifically, the discussion surrounding recommendation number 2 states: ²
5	
6	Our report following the January 2014 outages found a number of
7	examples of non-standard industry thinking associated with
8	reliability. The March 4th incident provides another telling example.
9	This suggests that more conventional approaches and the skills to
10	implement them are appropriate.
11	
12	Hydro notes that this recommendation is principled in nature and does not
13	specifically recommend what "non-standard industry thinking" should be addressed
14	or which "more conventional approaches" to adopt. In this regard, Hydro has
15	applied these principles to develop a more robust operational philosophy which has
16	benefited customers (primarily Newfoundland Power) through increased reliability
17	from 2015 through 2017.

 $^{\rm 2}$ Liberty Consulting's Review of the March 4, 2015 Voltage Collapse, Page 10.

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