

- 1 **Q. On page 1 of the Risk Assessment report it is stated “These recommendations are**
2 **supported by risk assessment results which indicate higher levels of risk across the**
3 **dimensions evaluated ...”.**
4
- 5 **a) Are these “higher levels of risk” in comparison to installation of a new CSS?**
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- 7 **b) If so, is this not an obvious conclusion?**
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- 9 **c) Wouldn’t adding additional years of operation to any piece of equipment**
10 **increase its risk of failure relative to replacing it with a new piece of**
11 **equipment?**
12
- 13 **A. a) The specific recommendations were based on a risk assessment of Newfoundland**
14 **Power’s CSS. On page 1 of EY’s 2018 report, the figure illustrates EY’s**
15 **assessment that a modern CIS would have lower risk levels as compared to**
16 **Newfoundland Power’s CSS.**
17
- 18 **b) No, it would not be an obvious conclusion. Age alone does not drive EY’s**
19 **recommendations, nor, in EY’s opinion, can age be used as a sole basis of**
20 **comparison of a legacy CSS to a modern CIS. The specific recommendations**
21 **provided were based on a risk assessment of Newfoundland Power’s CSS.**
22
- 23 **c) In general, newer equipment may be less prone to failure than older equipment.**
24 **However, age alone wouldn’t drive the delta. Often risks increase as equipment**
25 **continues to near and reach obsolescence. In relation to the technical risks facing**
26 **Newfoundland Power’s CSS, refer to EY’s 2018 technical risk report and EY’s**
27 **response to PUB-NP-021.**