

1 **Q. Re: Facility Rehabilitation (Pooled) - As regards the Generator Protection**  
2 **component of the Horsechops Plant project, can the existing generator protection**  
3 **system reasonably be expected to operate properly for the foreseeable future**  
4 **without the identified upgrades being made?**  
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6 A. No, it is not reasonable to expect that the existing generator protection system will  
7 operate properly for the foreseeable future.  
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9 The generator protection equipment is critical to the operation of the plant, and its  
10 deteriorated condition requires its replacement in 2009.<sup>1</sup> The existing generator  
11 protection equipment is original to the plant's 1954 construction and lacks 5 elements of  
12 the *minimum* protection set required for hydroelectric generators.<sup>2</sup>

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<sup>1</sup> See Schedule B, page 4 of 81 and *1.1 Facility Rehabilitation*, page 1.

<sup>2</sup> See *1.1 Facility Rehabilitation*, page 2.