

1 **Q. Re: Rocky Pond Plant Refurbishment (p. 2 of 81, Schedule B) - Does the likelihood**
2 **of a catastrophic failure of the penstock remain remote for the foreseeable future?**

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4 A. There is no reliable method to calculate the likelihood of catastrophic penstock failure
5 based on condition.

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7 The 2006 engineering assessment of the condition of the woodstave penstock completed
8 by Mr. Walter P. Smith P. Eng. of Hatch Energy recommended the penstock be replaced
9 based on the condition, extent of deterioration and potential for failure.¹

¹ Included as Appendix B of 1.2 Rocky Pond Hydro Plant Refurbishment report