In its 2011 Capital Budget Application, Hydro proposed a project to overhaul the Holyrood gas turbine, used for Holyrood black start, but subsequently decided to defer the project. Provide detailed, present-value comparison of the capital costs (and any other applicable costs) that would have been incurred if the Holyrood gas turbine overhaul had proceeded, in 2011, as originally proposed in the 2011 Capital Budget application, on the one hand, as compared to the capital costs, projected annual lease costs and other projected costs for the lease, installation, maintenance and use of the diesel units which are the subject of the present Application until late 2015, or such later date as Hydro may now be projecting a new combustion turbine to be installed and operational at Holyrood (or at another site as may be applicable).

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The scope of work for the 2011 Capital Budget Application to overhaul the gas turbine included the inspection and overhaul of the gas turbine engine only. A subsequent condition assessment of the gas turbine, completed in 2011, indicated that work was required on additional gas turbine subsystems such as the gearbox, power turbine disk, turbine blades, ducting, exhaust stack, generator and the generator exciter. Therefore, had the 2011 Capital Budget scope of work been completed, it would not have addressed all of the gas turbine issues in order to restore a blackstart solution.

As the 2011 Capital Budget Application to overhaul the gas turbine would not have resulted in working blackstart solution, it is Hydro's opinion that its costs cannot be meaningfully compared to the capital cost to install a working blackstart solution.