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Q. (Hydro Reply Evidence dated August 7, 2015, Appendix B) In the opinion of La Capra
Associates, Inc., was the diesel plant needed to meet requirements relating to black
start, and in particular, NERC requirements relating to black start?

A.

Please refer to the La Capra Associates Report, Appendix B to Hydro's Reply Evidence, pages 11 to 13 for a detailed discussion on the issue of black start. It is important to make the distinction between Holyrood on-site black start capability and the ability to black start the electric grid. Quoting from the referenced report:

Operational philosophies often can and do vary across jurisdictions, it is the very reason that the North American Electric Reliability Corporation ("NERC") requires the development of system restoration plans, but leaves it to the respective regions to develop their own restoration plan which includes the designation of which units would be counted on for black start. What is not debatable is that Hydro management consciously made the decision to tolerate the risk associated with not having black start capability at Holyrood on an interim basis until a permanent long term solution could be implemented, thereby relying solely on the Hardwoods Gas Turbine ("Hardwoods") to black start the Avalon Peninsula in the event it became separated from the rest of the system.