

1 Q. Reference: At page 16 of the report, Liberty states that it “concluded that most of
2 the outages were either weather-related or reflected the typical types of failures one
3 would expect”. Also at page 16, Liberty states that Hydro, “had to deal with
4 emergency circumstances caused by the unavailability of 233 MW of generation,
5 with high loads due to low temperatures (-18° C) and extreme wind chill factors.
6 These factors required institution of rotating blackouts.” Also at page 16 Liberty
7 states that it, “did not find a basis for imprudence with respect to supply planning
8 and management of unit availability during the relevant period”.

9
10 Please confirm Liberty’s understanding that the public outage inquiry dealt in part
11 with matters that Liberty found were not attributable to any imprudence on the
12 part of Hydro.
13

14
15 A. This response assumes that the reference to “the public outage inquiry” relates to the
16 Public Utility Board’s “Investigation and Hearing into Supply Issues and Power Outages
17 on the Island Interconnected System”. This Board proceeding deals with a scope greater
18 than what Liberty referred to on the page 16 language cited. The outages referred to on
19 page 16 were of generation resources, not customer outages. Liberty can speak only to
20 what our work encompassed, not the full scope of the Investigation. Liberty’s prudence
21 review included both the generation outages cited in the question and the much more
22 extensive outages that followed ensuing transmission system events.
23

24 For the work performed for the review of this particular topic, Liberty, as the language
25 cited in the question states, “dealt with” and did not find imprudence in supply planning
26 or in managing unit availability during the relevant period. Liberty “dealt with” and found
27 imprudence with respect to the extensive and extended outages that followed
28 transmission system events.