

- 1 Q. Reference: At page 17 of the report, Table 3.1, and estimated prudence-related  
2 costs of \$2,189,110  
3 (a) Please identify the sources of the data which Liberty used to populate the  
4 figures in Table 3.1.  
5 (b) Please advise if Liberty assumed in developing its estimated prudence-related  
6 costs calculation that Holyrood Unit 1 was unavailable for four full days,  
7 January 5-8, 2014. If Liberty did not assume that, please advise what Liberty's  
8 understanding was of the time period Holyrood Unit 1 was off between January  
9 5-8, 2014.
- 10  
11  
12 A. Liberty responds to the question's two parts as follows:  
13  
14 (a) Liberty obtained the data shown in Table 3.1 from Hydro's response to PR-PUB-  
15 NLH-132, Attachment 1, Page 1 of 3. The cost data sums the Corner Brook Pulp and  
16 Paper costs and the Hydro generation costs, shown, respectively, as the sixth and  
17 eighth columns of that attachment. The ninth column lists the breakdown of the units  
18 unavailable.  
19  
20 (b) Liberty understands that Holyrood Unit 1 tripped at 0905 on January 4, 2014, and  
21 returned to service at about 1530 on January 8, 2014. Liberty made no adjustments in  
22 its estimate to account for any days on which the unit may have been available for  
23 part of the day. Liberty did not find any adjustment to be appropriate for partial days,  
24 because the unit was unavailable at all times (except starting at about 1530 on  
25 January 8). Therefore, the only partial day was January 8, and most of the peak was  
26 missed on that date. Given the "rough" nature of the estimate, as noted in the report,  
27 a refinement for a few hours was not believed to be appropriate.