

1 Q. Reference: At page 27 of the report, Liberty states “Hydro cannot determine,
2 despite substantial efforts by its personnel and consultants, the causes of the
3 Sunnyside breaker failure on January 4, 2014. Liberty cannot do so either.”
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5 Please describe in detail all activities undertaken by Liberty to determine the causes
6 of the Sunnyside breaker failure on January 4, 2014.
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9 A. Liberty met in February 2014 with the Hydro team that studied the root cause of the
10 breaker failure. Liberty examined the document titled “ABB Investigation - B1L03
11 Breaker Failure to Trip Report,” dated February 10, 2014. Hydro included that document
12 in “A Review of Supply Disruptions and Rotating Outages: January 2-8, 2014, Volume
13 II, Schedule 8, Appendix 7, pp. 56 to 78” (filed in the Investigation and Hearings into
14 Supply Issues and Power Outages on the Island Interconnected System). Liberty
15 conducted review meetings with Hydro prior to the issuance of Liberty’s December 2014
16 report and the prudence report cited in this question.
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18 Following the receipt of information from these sources, Liberty applied its judgment,
19 based on industry experience, to the information received, and concluded that there was
20 not a basis for determining the cause of the B1L03 failure. Moreover, at the review
21 meetings, Liberty shared its observations that no precise cause had been identified, at
22 which times Hydro continued to offer no substantiation for the identification of
23 causation.
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25 Liberty chose to apply to the circumstances its judgment based upon its experience
26 regarding the clear connection between the conduct of appropriate maintenance and the
27 minimization of the risk of equipment failure. Liberty undertook extensive examination
28 of maintenance practices, as described in its December 2014 report in the Investigation
29 and Hearing into Supply Issues and Power Outages on the Island Interconnected System
30 and the prudence report cited in this question. With the continued absence of Hydro’s
31 ability to demonstrate a cause not related to delay of appropriate maintenance, Liberty
32 judged it appropriate to associate the failure with the lack of the conduct of appropriate
33 maintenance.