

- 1 Q. **Reference: At page 45 of the report, it was the opinion of Liberty that the following**
2 **costs were recommended for disallowance:**
3 **Sunnyside Environment Remediation \$346,000**
4 a) **Please provide how Liberty calculated the \$346,000 figure.**
5 b) **Please confirm that Liberty understood that the \$335,900 for consultants in**
6 **PR-PUB-NLH-152 (Revision 1, Jun 17-15) (located on second table page 2 of 3)**
7 **is for Sunnyside Environment remediation.**
8 c) **With respect to the \$335,900 figure, can Liberty please confirm that this amount**
9 **is included in the net income impact on the first table on page 2 of 3 of**
10 **PR-PUBNLH-152 (Revision 1, Jun 17-15) and the Sunnyside Replacement**
11 **Equipment 2014 Net Operating Expenses on page 44, table 9.1 of the Liberty**
12 **report.**
13
14
15 A. Liberty responds to the question's three parts as follows:
16
17 a) The \$346,000 comprises the total of four 2014 invoices from Stantec for
18 environmental remediation work at the Sunnyside substation. Liberty reviewed these
19 invoices as part of the response to PR-PUB-NLH-101, which provided Hydro's
20 Professional Services costs in 2014.
21
22 b) The response to PR-PUB-NLH-152 (Revision 1, June 17, 2015) details 2014
23 operating expenses for the "Sunnyside Replacement Equipment" project. The
24 referenced \$335,900 is labeled only "Consultants." It does not specify
25 environmental remediation as the reason for the expenditures. Liberty therefore did
26 not understand the costs to be for environmental remediation, nor can Liberty now
27 confirm that they were for such remediation.
28
29 c) See the responses to a) and b) above. Liberty does not have information about the
30 components of the \$335,900 consulting fees recently noted by Hydro. Liberty also
31 does not know if these fees overlap or are completely separate from the Stantec
32 costs.
33
34 d) Nevertheless, Liberty confirms that the \$335,900 is included in the net income
35 impact on the first table on page 2 of 3 of PR-PUBNLH-152 (Revision 1, Jun 17-15)
36 and the Sunnyside Replacement Equipment 2014 Net Operating Expenses on page
37 44, table 9.1 of the Liberty report.