

1 Q. **Reference: At page 46 of the report, Liberty states that it “concluded that the**
2 **\$511,000 in executive leadership and finance cost transfers would not have occurred**
3 **in the absence of the outages”.**

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5 a) **Please provide the basis for Liberty’s conclusion.**

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7 b) **Please provide the basis for the \$511,000 figure and Liberty’s understanding of**
8 **what activities those dollars were related to.**

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11 A. Liberty responds to the question’s two parts as follows:

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13 a) The bases for the conclusion are Responses to 2013 NLH GRA RFIs (numbered 94,
14 95 and 379) supported by discussions in work sessions with the Hydro Vice
15 President - Regulatory Affairs.

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17 b) The bases for the \$511,000 figure are Hydro’s responses to PR-PUB-NLH-92 and
18 94. Hydro provided this amount for incremental costs related to the 2014 power
19 outages under the classification of “Inter-Company Salary.” Hydro’s calculation of
20 this amount is detailed in the response to PR-PUB-NLH-94, Attachment 2. Liberty
21 understands that this amount represents charges made to Hydro for services provided
22 by the non-Hydro executives involved on activities that would not have occurred in
23 the absence of the need for response to the January 2014 outages.