

1 Q. Reference: At page 58 of the report, Liberty states that it “believes that Hydro’s
2 imprudence contributed to the damage” at Holyrood Unit 1.

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4 a) Liberty suggests that actions of Hydro “contributed to the damage”. Please
5 specify what portion of the damage Liberty suggests Hydro’s actions
6 “contributed to”.

7
8 b) Other than Hydro’s actions, please explain what other factors “contributed” to
9 the damage?

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

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14 a) The language from Page 58 reads:

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16 *The factors contributing to this catastrophic event are numerous and complex.*
17 *Liberty believes that Hydro’s imprudence contributed to the damage.*

18
19 Liberty looked at Hydro’s contribution to the *event*, and hence the damage. Chapter
20 Eleven of Liberty’s report describes those Hydro actions that Liberty believes were
21 imprudent. Had Hydro acted otherwise on any one of these, damage to the Holyrood
22 Unit 1 turbine would have been prevented. Hydro therefore should be accountable
23 for all of the damage.

24
25 b) Hydro’s root cause analysis describes all of the factors associated with the event.
26 Other factors, for which Liberty did not allege imprudence, include the initial trip of
27 the unit as well as the degradation of the backup AC power supply and subsequent
28 inability of the AC pump to start.