

1 Q. Reference: At page 64 of the report, Liberty states that “the information available
2 indicates that the vendor likely did not test the motor”.

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4 Please specifically indicate what “information available” indicates that the vendor
5 likely did not test the motor.
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8 A. It is Liberty’s understanding that, had the required test been performed, the inability of
9 the motor to reach rated speed would have been discovered. Liberty has no information
10 explaining how the test could have been performed without discovering the speed
11 problem, and to the best of our knowledge, Hydro has not included such information in
12 its root cause analysis or other supporting analyses. We therefore concluded that the test
13 was not performed. In addition, the lack of documentation by both Hydro and the Vendor
14 that the test was performed, including what was tested and the results, further supports
15 this conclusion. Finally, the vendor did not say “the test was performed”, but stated “the
16 test would have been performed”, which does not confirm that the test was actually
17 performed. The weight of the available information provides support for the conclusion
18 that the test was never performed.