Q. 1 Please describe whether and on what basis Hydro agrees or disagrees that the 2 cause of the latching mechanism or a DC control trip circuit problem that caused 3 the Sunnyside breaker B1L03 malfunction would have been identified and corrected if 6-year maintenance had been conducted prior to the malfunction.

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The investigation of the cause of the malfunction of the Sunnyside breaker B1L03 identified that the possible cause of the malfunction was the latching mechanism or a DC control trip circuit problem. However, Hydro does not agree these would have been identified and corrected if a six-year maintenance had been conducted prior to the malfunction. The basis for this is that following the failure of the breaker, Hydro worked with ABB (the Original Equipment Manufacturer for the breaker) to complete an investigation in February 2014. ABB was unable to definitively determine a specific cause of the malfunction. Hydro undertook suggested follow up recommendations. On April 26, 2014, a Battery Discharge Test was completed by Hydro to test the capacity of the battery bank, which did not show any sign of a problem. Further field testing of the breaker DC wiring was also completed on August 25, 2014 and this testing did not identify any reason for the breaker not operating.

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Based upon the ABB investigation and the follow up testing, Hydro has not determined the root cause of the failure of breaker B1L03. Thus, completion of the six-year maintenance prior to the event would also not have found a problem or initiated any corrective action with these items.