Q. PR-PUB-NLH-108 requested the "estimated reliability, in terms of failure to start or 1 2 other appropriate measure, of each of the eight diesel generators". Hydro responded in terms of an "Operational Availability" equal to .9974 and cited an IEEE 3 paper as the data source. In Liberty's experience, the critical measure for an 4 5 emergency diesel is its ability to start when called upon. Please explain why Hydro 6 believes "operational availability" is a more meaningful measure than ability to 7 start. Also please provide any information Hydro has on the ability to start of the 8 8 X 2 MW diesel units. 9 10 11 Α. Hydro does not believe that "operational availability" is a more meaningful measure than the ability to start, as the critical measure for an emergency diesel. However, 12 13 Hydro could not locate any meaningful statistics on "failure to start" for emergency 14 diesels. Among possible sources, the manufacturer indicated that they do not track 15 "failure to start" data. The Canadian Electricity Association also does not report 16 statistics on diesels in its Generation Equipment Status – Annual Report. Therefore, "operational availability" was considered as another relevant measure for which 17 data was available to respond to PR-PUB-NLH-108. 18 19 20 Please see Hydro's responses to PR-PUB-NLH-174, PR-PUB-NLH-176 and PR-PUB-21 NLH-177 for information Hydro has on the ability to start of the eight X 2 MW diesel 22 units.