

1 Q. Reference: Hydro’s Reply, page 7, lines 8-17. Please provide the data and
2 calculations supporting Hydro’s claim that the \$477,647 amount is “double
3 counted” as part of Liberty’s Holyrood Unit 1 supply-related cost recommended
4 disallowance.

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7 A. Please refer to Hydro’s response to PR-PUB-NLH-190. The \$477,647 amount is
8 “double counted” due to the fact that these costs (which are for January 5, 2014
9 only) are already included in a separate proposed Liberty disallowance in Table 11.2
10 (Page 65) of the Liberty Final Report in the line item Replacement Power; i.e., the
11 \$477,647 is the January 5, 2014 component of the \$504,610 referred to in Table
12 11.2 (corrected to \$525,897 in Hydro's response to PR-PUB-NLH-187). As Liberty is
13 proposing a specific disallowance of the replacement power costs related to the
14 Unit 1 vibration issue, these same costs can then not be counted as part of a
15 separate replacement cost disallowance for the same period and in relation to the
16 same costs as Liberty's calculation on Page 17 of its Final Report would do.