

1 Q. Reference: Prudence Review - Hydro's Response to Liberty's Report - Circuit Breaker
2 Performance in Cold Weather - page 13, lines 16-18

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4 Please point out where Liberty Consulting has stated that sustained cold weather
5 can have an impact on circuit breaker performance.

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8 A. Hydro's Reply Evidence did not intend to claim that Liberty stated sustained cold
9 weather can have an impact on circuit breaker performance. Hydro's Reply
10 Evidence intended to indicate Liberty highlighted that the weather conditions in the
11 period of interruptions and subsequent to the interruptions were sustained and
12 severe cold weather. This reference is made several times in the Liberty Report
13 (e.g. Page 16: "extreme wind chill factors", Page 17: "lower than expected
14 temperatures", Page 18: "very cold weather", Page 19: "such circumstances as
15 extraordinary", Page 21: "extreme weather").

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17 Hydro was noting that extreme cold weather, such as indicated by Liberty, can have
18 an impact on Hydro's circuit breaker performance, even though cold weather was
19 not definitively found to be the cause of Hydro's breaker misoperation.

20 Newfoundland Power's circuit breakers would have been exposed to the same
21 weather conditions in the early January 2014 period, and Newfoundland Power
22 states in its *Interim Report on Supply Issues and Power Outages on the Island*
23 *Interconnected System*: "There were 9 substation breakers or reclosers which failed
24 to operate correctly during the rotating power outages during January 2-8, 2014.
25 These failures prolonged the duration of customer outages. The majority of the

- 1 failures were due to the cold temperatures affecting the operating mechanisms”
- 2 (Page 25, lines 9-12). Please see also Hydro's response to PR-V-NLH-004.