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1 Q. On pg. 6 of Exhibit 23 it is stated that in August 2010 performance criteria were 2 revisited as it was proposed that the system should not be required to withstand a three-phase fault at Bay d'Espoir. Did the criteria for the Labrador-Island HVdc 3 system in place before August 2010 require that the system be able to withstand 4 such a three-phase fault? 5 6 7 8 System integration studies completed prior to August 2010, including DC1020 -A. 9 HVdc System Integration Study Volume 5 - Transient Stability Study filed as "CE- 07-10 DC1020 volume 5 filed.pdf" assumed that the Island ac system with the proposed 11 HVdc converter station at Soldiers Pond be required to withstand three phase faults. 12 13 During the process of finalizing performance criteria and the basis of design, the 14 assumption that the system should withstand the Bay d'Espoir three phase fault 15 was not considered necessary because the Island Interconnected system is 16 currently unable to withstand a similar fault.