

1    Q.    **Re: Project B-9 Replace Fuel Oil Heat Tracing**

2           Confirm that, as appears to be the conclusion of the Appendix C Root Cause Failure  
3           Analysis of Electric Heat Tracing report, the failure of the Electric Heat Tracing was  
4           due to Hydro staff error, rather than error by Tyco Thermal Controls ("Tyco") or  
5           some other contractor to Hydro. Confirm that Hydro has no warranty claim or other  
6           claim against Tyco or another third party to recover the cost of the failure of the  
7           current Electric Heat Tracing system and/or to defray the cost of the proposed  
8           Project to replace the Electric Heat Tracing System.

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11    A.    Yes, Hydro confirms that the failure of the electric heat tracing system after the  
12           repairs between 2002 and 2004 was due to a Hydro error. Hydro has no warranty  
13           claim or other claim against Tyco or other third party to recover the cost of the  
14           failure of the current electric heat tracing system and/or to defray the cost of the  
15           proposed project to replace this electric heat tracing system.