

1 Q. What evidence does Hydro have that \$1,000,000 is the appropriate limitation of
2 liability amount for industrial customers generally, and for North Atlantic
3 specifically?
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6 A. The \$1,000,000 limitation of liability was negotiated by Hydro and counsel
7 representing the Industrial Customers in 2002 (please see Decision and Order of the
8 Board, Order No. P.U.7(2002-2003)). Further, the service contracts for Hydro's
9 other Industrial Customers, including new Industrial Customers Praxair Canada Inc.
10 (Order No. P.U. 9(2013)) and Vale Newfoundland & Labrador Limited (Order No.
11 P.U. 6(2012)), all contain a \$1,000,000 limitation of liability clause.)