

1 Q. Hydro proposes that North Atlantic should have in place sufficient alternative
2 generation capacity to provide essential backup power in the case of an unplanned
3 interruption of Hydro's service to North Atlantic, as would be the case with a
4 hospital. With reference to the evidence of Glenn Mifflin in Hydro's 2001-2002
5 General Rate Application, and Hydro's subsequent knowledge of the electricity
6 service requirements of North Atlantic, does Hydro maintain that there is a valid or
7 useful comparison to be made between the capital investment required to provide
8 essential backup power requirements of a hospital and the capital investment
9 required to provide backup power for an oil refinery?

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12 A. Yes, Hydro does maintain that there is a valid or useful comparison to be made
13 between the capital investment required to provide essential backup power
14 requirements of a hospital and the capital investment required to provide backup
15 power for an oil refinery. Hospitals have a need for uninterrupted supply of energy
16 for operations they deem critical and therefore act accordingly to ensure those
17 critical operations can be maintained if there is a supply interruption. To the
18 degree that NARL has critical operations that need to be maintained to prevent
19 catastrophic losses that will occur if there is a service interruption then Hydro
20 would expect NARL, as a business, to act accordingly to protect those critical
21 operations. Hydro cannot and does not warrant a completely uninterrupted power
22 supply.