

- 1 Q. The Board's Interim Report, Investigation and Hearing into Supply Issues and
2 Power Outages on the Island Interconnected System, May 15, 2014, Page i.
3 *"The Board is able to conclude at this stage that the following caused or*
4 *contributed to the outages:*
- 5 • *Hydro's deferral of scheduled preventive maintenance and testing of key*
6 *transmission system equipment, including the 2013 scheduled and*
7 *recommended testing and maintenance on the transformer and circuit breaker*
8 *at Sunnyside, which failed.*
 - 9 • *Hydro's failure to properly execute repairs and maintenance.*
 - 10 • *Hydro's failure to ensure the availability of qualified resources and vendor*
11 *support.*
 - 12 • *Hydro's failure to procure critical spare parts for its generation assets.*
 - 13 • *Hydro's decisions on timing of generation asset repairs, notably the*
14 *Hardwoods and Stephenville gas turbines."*

15 Please describe in detail the impact each of these causes or contributing factors
16 identified by the Board had on (i) the need to pursue an interruptible arrangement
17 with CBPP and (ii) the need to use additional diesel and gas turbine generation.
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- 20 A. Details of the causes of the generation capacity shortfalls are discussed in Hydro's
21 response to NP-NLH-002, and CBPP (interruptible) capacity assistance details are
22 discussed in Hydro's response to NP-NLH-004. The question posed presupposes
23 that certain actions if taken by Hydro could have prevented the system issues
24 experienced in January 2014. Hydro notes the Board's finding at page (ii) of its
25 Interim Report that "it is not possible to determine whether the failures or outages
26 of this past winter could have been avoided had different decisions been made by

- 1 Hydro". Thus, the question is speculative in that it requires an assumption that
- 2 certain actions would have prevented the issues experienced and that such actions
- 3 would have been approved by the Board for cost recovery in customer rates.