

1 Q. Re page B-109: Provide the 2003 and 2005 studies referred to in the  
2 "Operating Experience" for this project and an outline of the proposed work  
3 under the second two years of the three year program referred to. Provide  
4 numbers and details of the incidents of unauthorized access to or vandalism  
5 at sites of Hydro facilities that would support the need for additional security  
6 measures in this project.

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9 A. Hydro commissioned three consultant studies on security. These were:  
10 • "Security Inspections, Holyrood Thermal Generating Station" - Robert  
11 Humes – October 2003.  
12 • "Security Risk Assessment, Hydro Facilities" - Forensic Investigations  
13 Canada, Inc. – December 2005  
14 • "Holyrood Marine Facility Security" – MacDonnell Group Consulting Ltd. –  
15 May 2004.

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17 Because these reports and the specific details of work proposed by Hydro  
18 deal with Hydro system security issues, they are confidential and should not  
19 be released into the public record. However, Hydro would be willing to  
20 provide them to the Board and Counsel for the Intervenor, in confidence.

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22 Working with these consultants' findings, Hydro prepared a generalized  
23 three-year plan for security upgrades across the whole system. Part of the  
24 work proposed for 2007 is to conduct a detailed review and evaluation of this  
25 generalized plan and confirm the priorities and timings of the projects to be  
26 undertaken. Hydro would be willing to provide this to the Board and Counsel  
27 for the Intervenor, in confidence.

1 Below is a "Summary of Unauthorized Access to Hydro Facilities". As can be  
2 seen from this list, these incidents mostly relate to break, entry and theft.  
3 Details of these incidents can be provided upon requests. While these sorts  
4 of incidents will be addressed under these security upgrades, they are not  
5 the main justification for this proposal. The main justification for the 2007  
6 proposal and the whole security upgrade program is to strengthen the  
7 protection of Hydro's critical energy infrastructure against the threat of  
8 terrorism and crime. Hydro feels that a properly structured and deployed  
9 program will reduce and possibly eliminate some preventable losses and will  
10 meet or exceed the industry's practices for physical security  
11 countermeasures.

Summary of Incidents of Unauthorized Access to Hydro Facilities 18-Aug-06		
Date	Location	Description
1/12/1998	Holyrood Mechanical maintenance shop	Missing hand tools
2/6/1998	Holyrood Maintenance shop temp. supervisor office	Stolen tool
4/14/1998	Holyrood Boiler house	Missing drop lights - theft
4/21/1998	Holyrood Welding shop	Missing tool - theft
5/22/1998	Holyrood Mechanical #3 condenser	Missing tool - theft
8/12/1998	St. Anthony Line department	Stolen vehicle
10/1/1998	Mary's Harbour diesel plant	210 litres of lube oil missing
1/14/1999	Holyrood Safety center	Equipment theft
2/27/1999	Port Hope Simpson diesel plant	60 litres of oil missing
5/10/1999	Harwoods gas turbine	Theft of portion of dyke liner
6/2/1999	Holyrood Utility storage area	Missing equipment
6/24/1999	Holyrood Powerhouse	Stolen Tool
10/12/1999	Waste Water Treatment Plant	Theft of chain saw
10/29/1999	Holyrood	Stolen/missing angle drill
4/15/2001	Woody Point Depot	Theft of Hydro snowmobile
9/23/2002	Bishops' Falls Yard	Chain-Saw Stolen
5/10/2004	Paradise River HGS	PRV - property stolen
10/14/2005	Vehicle #1277, St. Anthony Yard	Theft of Tools
6/29/2006	Churchill Falls	Theft - Trailer Hitch