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1 Q: (Liberty December 17, 2014 Report to Board on Supply Issues and Power 2 Outages Review Island Interconnected System addressing Newfoundland and 3 Labrador Hydro) It is stated (page 1): "Newfoundland Power reported outages 4 to three-quarters of its retail customers during the two series of events that took 5 place between January 2 and 8 of 2014. Some of them were for extended periods 6 of time. Newfoundland Power attributed 15 percent of its customer outages to the capacity-induced rotating outages of January 2<sup>nd</sup> and 3<sup>rd</sup>, and 80 percent to the 7 8 equipment related outages that followed and finally ended on January 8th. Winter 9 storm conditions coinciding with these events independently produced the 10 remaining 5 percent of outages for Newfoundland Power's retail customers". Does Liberty's analysis support these percentages? Please provide Liberty's 11 analyses showing the amounts and percentages attributable to each cause, and 12 13 explain how Liberty factored into its recommendations the contribution of 14 each to the outage events of January 2014.

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18 19 A. The information referred to came from page 1 of Newfoundland Power's March 24, 2014, "Interim Report Related to The Board's Investigation and Hearing into Supply Issues and Power Outages on the Island Interconnected System." Liberty did not verify the accuracy of the percentages.

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Liberty examined the reasons for the rotating outages, how they were conducted, the nature of Hydro's equipment failures, the cause of equipment related outages, and the nature of equipment damage to Newfoundland Power's equipment. Liberty's reports addressed Hydro's generation shortfalls, which required Hydro and Newfoundland Power to implement the rotating outages, and Liberty examined Hydro's equipment failures in detail. These factors were taken into account in the recommendations that were made.