

- 1    **Q:**    **In Liberty’s opinion, does the June 2009 report undertaken by Ernest Orlando**  
2           **Lawrence Berkeley National Laboratory entitled “*Estimated Value of Service***  
3           ***Reliability for Electric Utility Customers in the United States*” prepared for the**  
4           **U.S. Department of Energy (see website: [http://certs.lbl.gov/pdf/lbnl-](http://certs.lbl.gov/pdf/lbnl-2132e.pdf)**  
5           **[2132e.pdf](http://certs.lbl.gov/pdf/lbnl-2132e.pdf)) provide a reasonable basis for Hydro to conduct a similar study**  
6           **specific to electricity consumers of this Province? Would this provide useful**  
7           **information in addressing your statement (Liberty’s Interim Report, page ES-**  
8           **2): “*Liberty believes it is time to reassess the service reliability and cost balances***  
9           ***that underlie the decisions on what level of supply resources to make available*”?**  
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12    **A.**    The dollar cost (and savings) for a utility to avoid a customer interruption or  
13           customer minutes of interruption can often be realistically estimated for developing  
14           and budgeting generation, transmission, and reliability activities. What cannot be  
15           determined objectively, however, is the value to place on an interruption to the  
16           average customer in all the affected classes. Studies like the one referenced have  
17           value in informing judgment, but Liberty has seen no way to make that judgment  
18           anything other than a subjective one, albeit informed by as much objective data as  
19           is available. Liberty does not consider the application of attention and resources to  
20           such a study a priority for Hydro.