Q. Reference: Energy Supply Risk Assessment Update, November 30, 2016, Appendix
A. The DAFORs for the Holyrood units in the off-peak months would seem to be
irrelevant and have the potential to provide misleading results. Would it be more
appropriate to calculate historical DAFORs for only the on-peak months or,
alternately, use UFOP instead of DAFOR? Please comment on how the conclusions
regarding Holyrood reliability might differ.

A.

Hydro does not agree that unavailability of a Holyrood unit or a de-rated Holyrood unit in the off peak months (assuming the question is meant to infer April to November) is irrelevant or have the potential to provide misleading results. Hydro plans for the up-time of these units outside the winter period in order to facilitate required maintenance and upgrade timeframes at Holyrood and at other generating facilities, and on the transmission and terminal station system, while still meeting customer demand. The Energy Supply Risk Assessment contemplates that unit derating or unplanned outages can occur in the off-peak *or* on-peak months, resulting in a probabilistic expectation of the contribution of these units to the reliable operation of the Island Interconnected System whenever they are required.

UFOP is the probability that a generating unit will not be available when required and does not contemplate a generator de-rating, which is an important factor for system planning. The measure UFOP is typically used for stand-by units and not base load units, such as Holyrood (and the hydraulic units such as those at Bay d'Espoir). For these reasons, Hydro does not feel utilizing UFOP for Holyrood reliability is appropriate.