

- 1 **Q: (a) While Liberty is satisfied with the reliability of Hydro's IIS hydraulic**
2 **units, is there any risk with respect to availability of water from Hydro's**
3 **reservoirs?**
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- 5 **(b) In particular, is Liberty aware of any assumptions made by Hydro in that**
6 **regard and, if so, is Liberty in agreement with those assumptions?**
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- 9 **A. (a)** Liberty's reviews of Hydro's supply capabilities have generally been focused
10 on capacity requirements and not energy, which in Hydro's case is governed
11 primarily by the amount of water available to drive the hydraulic units. In its
12 November 2016 ESRA, Hydro addressed this question at Page 30 by referring
13 to increased capability and specifically "increased reservoir levels" since its
14 May 2016 ESRA. Further, Hydro stated "the capability indicated is well in
15 excess of Hydro's forecasted system energy requirements". Hydro also stated
16 that it reports to the Board monthly on system hydrology. Nevertheless, Liberty
17 has not evaluated likely variations in water levels and is therefore not able to
18 comment on any associated risk.
19
- 20 **(b)** Liberty is not aware of any assumptions by Hydro regarding water levels other
21 than those referenced above, and Liberty has no reason to question those
22 above.