

- 1 **Q: Based on Liberty's experience and available information, is it reasonable to**  
2 **conclude that Hydro's experience to date, including its experience with the**  
3 **current link of Churchill Falls to Montagnais transmission, has not provided**  
4 **Hydro with any experience in regard to NERC compliance. Please outline the**  
5 **challenges that, in Liberty's view, Hydro faces in addressing the need for NERC**  
6 **compliance prior to the ML coming into service.**  
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- 9 A. Liberty has no knowledge of Hydro's experience relating to its Churchill Falls-  
10 related transmission facilities. We are unaware of how that experience may be  
11 contributing to Hydro's plans for NERC/NPCC future compliance.  
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13 Regarding "the challenges that, in Liberty's view, Hydro faces in addressing the need  
14 for NERC compliance prior to the ML coming into service", please see our response  
15 to IC-PUB-011.