

1 **Q: Reference: *Review of Newfoundland and Labrador Hydro Power Supply***  
2 ***Adequacy and Reliability Prior to and Post Muskrat Falls Final Report, Pages 71-***  
3 ***74, and the response to Request for Information NP-NLH -139.***  
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5 **In the response to Request for Information NP-NLH-139 Hydro indicates that a**  
6 **failure rate of 0.1 failures per year per bipole should be applied and that the**  
7 **structural failure rate of 0.002 per year should be applied for the section of the**  
8 **Labrador Island Link on the Avalon Peninsula and 0.00667 per year should**  
9 **apply to other sections.**

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11 **Please explain whether or not Liberty accepts the structural failure rates**  
12 **indicated above to be reflective of the potential structural failure on the**  
13 **Labrador Island Link. If Liberty does accept these failure rates, please indicate**  
14 **why Liberty concludes that additional generation is required following the**  
15 **integration of the Muskrat Falls project, the Labrador Island Link, and the**  
16 **Maritime Link.**

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19 **A.** Liberty has not offered an opinion on the adequacy of structural failure rates  
20 proposed by Hydro. Please see our response to NP-PUB-022.

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22 Also, note that Liberty's conclusion that post-Muskrat Falls generation is likely  
23 needed is based on the probability (more than once every three years) and  
24 consequences (load shedding) of a bipole failure. This probability is stated in  
25 Conclusion V-15 of our report as follows:

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27 *"Hydro estimates the average number of bipole outages to be 0.10 for the*  
28 *converter stations and 0.22 for the HVdc OHL, giving a total of 0.32, i.e., a*  
29 *bipole failure about every three years."*