

1 Q: Reference: *Evaluation of Pre-Muskrat Falls Supply Needs and Hydro's November*  
2 *30, 2016 Energy Supply Risk Assessment Final Report, The Liberty Consulting*  
3 *Group, Page 28.*

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5 *“If the 110 MW recall power is available, and we assume it is, the delay issue is*  
6 *less threatening. We will then be in a mode of waiting to see if the declining*  
7 *thermal reliability and increasing load growth (if they happen) can catch up to and*  
8 *surpass that 110 MW before Muskrat Falls is in service (presumably 2022-23). If*  
9 *the recall power becomes in doubt, all bets are off and the Muskrat Falls delays*  
10 *rise to the highest threat level.”*

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12 In Liberty's opinion, when should availability of the 110 MW of recall power be  
13 confirmed in order to avoid the “all bets are off” scenario referred to in the  
14 cited passage?

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17 A. It is Liberty’s understanding that the availability of the 110 MW of recall power has  
18 already been confirmed by Hydro. Please see Hydro’s response to PUB-NLH-630  
19 and Liberty’s comment, on page 22 of its report, stating “*Hydro has completed a*  
20 *study that certifies the feasibility of transmitting recall power*”. On that basis Liberty  
21 did not include the availability of the recall power as a risk factor.

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23 Although Liberty accepted Hydro’s certification on the availability of recall power,  
24 Liberty did state, on page 31 of its report, that the availability of the recall power in  
25 2019-20 “*is a deal changer, providing there is a level of confidence that supply will*  
26 *be adequate*” and on page 32 that the assumption is “*that all technical requirements*  
27 *and commercial arrangements are in place for the recall power*”.

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29 Liberty is of the opinion that if there are any issues on the commercial arrangements  
30 for or the technical feasibility of accessing recall power they could be pursued in the  
31 next stage of the Phase Two proceeding.