

1 Q. **Reliability and Resource Adequacy Study Update, November 15, 2019**

2 ***TGS Study Reports***

3 Further to PUB-NLH-172, please provide a robust description of what Hydro defines as
4 commercial issues with respect to LIL operation, as opposed to those issues where Hydro does
5 have a role. Secure from Nalcor agreement to provide its views on LIL operational restrictions
6 that's General Electric has imposed and advise when it has been received.

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9 A. As Newfoundland and Labrador Hydro ("Hydro") is not the owner of the Labrador-Island Link
10 ("LIL"), and is not a party to any of the contractual agreements between the asset owner and
11 the contractors engaged to construct and otherwise complete the work necessary to make the
12 asset operational, Hydro does not have a role in the construction, testing, or commissioning of
13 the asset other than by consulting with the asset owner on a mutually agreed upon project
14 schedule and the tests required before interconnection. The Newfoundland and Labrador
15 System Operator ("NLSO"), through the Multi-Party Pooling Agreement, has the operational
16 control and authority to provide transmission service over the asset. The NLSO has the authority
17 and responsibility to, among other things, operate the asset in accordance with good utility
18 practice to maintain the reliability of the Newfoundland and Labrador Transmission System and
19 ensure compliance with applicable NL Reliability Standards and Operating Requirements.

20 With respect to Nalcor's views on LIL operational restrictions imposed by General Electric,
21 please see Nalcor's response contained within Hydro's correspondence, filed on July 24, 2020,
22 regarding Liberty's Summary of and Comments on LIL Study Reports Issued in April 2020.