

1 Q. **Tab 2; Volume II: Increase Fuel & Water Treatment System Capacity**

2 The addition of TL267, the Maritime Link, and the Labrador-Island Link is expected
3 to allow greater access to generation west of the Avalon. With this greater access to
4 generation, is there still a requirement for either increased fuel storage or
5 additional water treatment system capacity at Holyrood? If so, please explain.

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8 A. Yes, there is still a requirement for both increased fuel storage and additional water
9 treatment system capacity at Holyrood when there is greater access to generation west of
10 the Avalon. The additional fuel storage and water treatment capacity are required to allow
11 reliable and compliant operation of the Holyrood gas turbine in the event of a contingency
12 event such as is discussed in the response to NP-NLH-014. In this case, operation of the
13 unit for an extended period at higher loads may be required. Hydro's experience to date
14 under these conditions has resulted in operation of the unit outside its certificate of
15 approval conditions and has required the implementation of additional delivery
16 mechanisms to maintain required fuel levels without major interruptions in fuel deliveries.
17 Hydro believes such mechanisms are not prudent long term solutions, as they carry their
18 own risks. For example, transferring fuel from tanks at Hardwoods carries a significant
19 environmental risk of fuel spills while transferring, or obtaining fuel from a non-contracted
20 provider who would have no obligation to provide fuel, and the non-contracted fuel
21 provider has in the past required their other customers to be displaced in their fuel delivery
22 in order to supply Hydro.