

1 Q. Will the Holyrood Thermal Generation Station be able to operate in whole or in part, without  
2 the proposed refurbishment which is the subject of this Application? Please provide a detailed  
3 response.

4 A. The four projects, as stated in the Application, are necessary for the safe and reliable operation  
5 of the Holyrood Thermal Generating Station ("Holyrood TGS"). Each project report includes  
6 Newfoundland and Labrador Hydro's ("Hydro") opinion regarding the impact of deferral of the  
7 project; in each case, deferral presents an unacceptable risk to Hydro's ability to safely and  
8 reliably meet peak customer demand requirements. While the Holyrood TGS is currently  
9 capable of operating at full capacity, failure to complete these projects would increase the risk  
10 of failure and should such failures occur, compromise Hydro's ability to supply customers and  
11 compromise Hydro's commitment to keep the Holyrood TGS fully available for generation until  
12 March 31, 2022.