

- 1 **Q. In the June 2018 CSS Technical Risk Assessment, page 1, EY recommended that**
2 **Newfoundland Power "formalize and deepen its examination of CSS modernization**
3 **options to include a thorough evaluation of the costs and benefits of replacement and**
4 **deployment options. In addition, Newfoundland Power should develop contingency**
5 **plans for CSS support and training to mitigate any unexpected loss of key personnel**
6 **over the next five years" (from 2018 when the study was undertaken until its**
7 **replacement in 2023). NP ignored the second recommendation stating "Based on**
8 **Newfoundland Power's research, it is not feasible to develop a contingency plan for**
9 **CSS support and training" (CA-NP-143(b)). Given Newfoundland Power's**
10 **confidence in EY's extensive experience in this area, why is it that EY made a**
11 **recommendation to develop contingency plans that NP claims are not feasible?**
12
- 13 **A.** This recommendation related to training was intended to be a short-term measure while
14 further assessment and planning were conducted versus long-term solution to address
15 Newfoundland Power's CSS support risks. Our understanding is that Newfoundland
16 Power explored options for adopting that recommendation and determined that external
17 training services were limited to non-existent and in-house training capacity did not exist.