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	Page	1		Page 3
1	CHAIRMAN:	1	1	was work going on in other stations on the
2	Q. So, there are no preliminary matters? I think	2	2	Avalon Peninsula which would affect the lines
3	I am correct, am I?	3	3	coming in and out of Holyrood as well. So,
4	MS. GLYNN:	4	4	all of those elements would have made it
5	Q. Yes, you are, Mr. Chair.	5	5	challenging and introduce risks by switching
6	CHAIRMAN:	6	6	out more breakers in Holyrood.
7	Q. So, we're back to the same panel and we're	7	7 MI	R. COXWORTHY:
8	over to you, Mr. Coxworthy, sir.	8	8	Q. The other work, the work that wasn't being
9	MR. COXWORTHY:	9	9	done in the Holyrood switch yard, was it work
10	Q. Thank you, Mr. Chair. Good morning,	10	0	that had to be done in August of 2015 in terms
11	gentlemen.	11	1	of timing? Could it have been done at other
12	DARREN MOORE, PAUL HUMPHRIES, ROBERT HENDERSON, TERANCE	12	2	times?
13	LEDREW - PREVIOUSLY SWORN - RESUMES THE STAND	13	3 MJ	R. HENDERSON:
14	CROSS-EXAMINATION BY MR. PAUL COXWORTHY	14	4	A. The entire work plan for the year was laid out
15	MR. COXWORTHY:	15	5	early and it is quite a co-ordinated effort
16	Q. I wanted to return to a topic we were talking	16	6	when you have so much work going on and
17	about on Friday and that's the work that was	17	7	replacing equipment to get it timed right
18	being done in August 2015 that made it not	18	8	equipment deliveries, with crews and those
19	possible to do the black start testing for the	19	9	types of things. So, there is a large element
20	100 mega watt CT to test whether it could	20	0	of planning for all of those equipment
21	black start the Holyrood generation station	21	1	outages.
22	proper. I'm referring to page 153 of your	22	2 MI	R. COXWORTHY:
23	evidence on Friday, October 30, Mr. Henderson,	23	3	Q. So, did the work plan originally include
24	starting at Line 11. There were three, and	24	4	testing the 100 mega watt CT in August 2015?
25	perhaps others, but there were three aspects	25	5 MI	R. HENDERSON:
	Page	2		Page 4
1	of work that you spoke about there which took	1	1	A. The plan was to do it at some point during the
2	resources away from what otherwise would have	2	2	summer before the plant came back into
3	been available to do that work in August. And	3	3	service, late in the summer. So, that was
4	one of them was that there was a "large amount	4	4	part of the original plan, was to do that. A
5	of work being done in our Holyrood switch	5	5	lot of the details for that got developed
6	yard". Was the 100 megawatt CT generator,	6	6	during the year and it depended on the timing
7	during that August period when the three	7	7	of getting all the pieces ready in the
8	Holyrood turbines were down, the turbines	8	8	combustion turbine as well.
9	proper, was that available to provide power to	9	€ MI	R. COXWORTHY:
10	the system, if needed? Could it have been -	10)	Q. So, is it fair to say that some of the other
11	MR. HENDERSON:	11	1	pieces of the work plan must have moved around
12	A. It was operated during that time.	12	2	to make it not possible to proceed in August
13	MR. COXWORTHY:	13	3	2015?
14	Q. Okay, so the switch yard wasn't completely	14	4 MI	R. HENDERSON:
15	shut down during August to do that switch yard	15	5	A. So, there were a number of things that were
16	work?	16	5	moving around in terms of affecting schedule
17	MR. HENDERSON:	17	7	and that sort of thing.
18	A. No, it wasn't.	18	3 MI	R. COXWORTHY:
19	MR. COXWORTHY:	19)	Q. I'd like to move back to the 2011 capital
20	Q. Would any switch yard work had been done in	20)	budget and if I could ask Mr. Gray to bring up
21	August of 2015?	21	1	Information No. 32 which is the response to
22	MR. HENDERSON:	22	2	the Industrial Customer RFI-26 in that Capital
23	A. We were doing breaker replacements down in	23	3	Budget Application. The work and the steps
24	Holyrood and so that would mean elements of	24	4	that were outlined in the response to IC-NLH-
25	the switch yard were out of service. There	25	5	26 that were going to be done by Hydro, that

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1 Hydro is telling the Board were going to	be 1	address the stop work order i	ssues, which was	
2 done, apart from obtaining the Level	2 2	not successful.		
3 condition assessment, was any of that of	her 3	MR. LEDREW:		
4 work done that's described inand I can t	take 4	A. Correct, several attempts act	ually. We had	
5 you through it and I guess I'm conscious	s of 5	different agencies involved	to reduce it	
6 time. So, if necessary, we can go through	n it 6	without tearing about the wh	ole machine.	
7 paragraph by paragraph or perhaps you of	could 7	MR. COXWORTHY:		
8 review it and advise me if anything was of	done 8	Q. So, I mean, we can go to it,	but in the 2011	
9 as outlined in IC-NLH-26.	9	capital budget, there was a r	eport filed and	
10 MR. LEDREW:	10	it's part of the material that w	vas filed as IC	
11 A. We had made attempts previous to that	to 11	or as Information 31. The	re were outage	
12 replace exhaust gas leaks and the oil leaks	s as 12	statistics given for the Holyr	ood gas turbine,	
13 I suggested to you in the main gearbox an	id we 13	in terms of justification for v	vhy major work	
14 could not totally eliminate them. So, tho	se 14	had to be done in relation to	that turbine.	
15 problems remain.	15	None of that, none of the wo	ork that had been	
16 MR. COXWORTHY:	16	envisioned to address those i	ssues was done?	
17 Q. Was that the issue that resulted in a stop) 17	MR. LEDREW:		
18 work order?	18	A. Correct, yeah.		
19 MR. LEDREW:	19	MR. COXWORTHY:		
20 A. Yes, it was.	20	Q. If we could turn to the La Ca	apra report, the	
21 MR. COXWORTHY:	21	August or the one that's a	ttached to the	
22 Q. Was it the issue that was intended to b	e 22	August 2015 Hydro reply ev	idence, page six?	
23 addressed by the capital budget project in	the 23	And if we could move down	to the last bullet,	
24 2011 Capital Budget that was deferred	and 24	yes. "After the 2010 repairs	s", this is La	
25 withdrawn?	25	Capra, Hydro determined	that a more	
	Page 6		Page 8	
1 MR. LEDREW:	1	comprehensive condition as	sessment of the	
2 A. No, the capital budget was the actual jet	2	Holyrood GT was needed."	These are the	
3 engine itself was going to be overhauled. So,	3	attempted 2010 repairs that a	re being referred	
4 this was a gearbox; this was new learning -	4	to by -		
5 MR. COXWORTHY:	5	MR. LEDREW:		
6 Q. I understood it was different work, I just	6	A. Correct, yean.		
/ want to confirm that.	/	MR. COXWORTHY:	an mars on than	
8 MR. LEDREW:	8	Q. The unsuccessful ones. If we	L'm corre when	
9 A. Fes, different work.	9	I'm referring to page six. I'r	n referring to	
10 MR. COXWORTHY;	10	the top page number in Appe	n leferning to	
12 the issue that resulted in the stop work	11	to the bottom page number	So it's actually	
12 une issue that resulted in the stop work	12	nage five of this report. But	Ms Grav has	
14 outlined in IC-NI H-26 that was done other	13	anticipated that thank you	Wis. Oray has	
15 than a request to level 2 condition	15	So on page 7 of 39 of App	endix B or nage	
16 assessment?	15	five of the La Capra report	at the bottom	
17 MR LEDREW	17	half, he talks about events the	at he dates from	
A. No, I don't believe, we didn't resolve any of	18	March of 2010 and the second	and bullet there.	
19 those issues.	19	decision. "Due to the stop w	ork order" which	
20 MR. COXWORTHY:	20	of course was issued in Ma	rch 2010 "Hydro	
21 Q. So, when it came back on in February 2011 w	vhen 21	decided to withdraw the over	haul proposal and	
the Province allowed it to be used for	22	the CBA." But of course,	that wasn't	
23 emergency purposes, I should say, the gas	23	withdrawn until later in the y	ear? Would you	
turning with the black start, that's the only	24	is that correct?		
25 work that had been done, is the attempt to	25	MR. LEDREW:		

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$\begin{vmatrix} 1\\ 2\\ 2 \end{vmatrix}$	A. That's correct. It was a while. MR. COXWORTHY:	-	1 2	1 2 2		email there	l from Mr. Banfield to Mr. Haynes, if 's any indication internal to that email
	Q. So it wash i just because of the stop work			3 1		nrior	to that or after that I'd like to
	order mat me -		4	4 5		inclu	de that in the record in the undertaking
6	A No it was condition assessment process was		5	5		reque	act mat in the record in the undertaking
	happening as well yeah			0 7 N	MS		
	MP CONVORTING as wen, yean.			9 IV.	1VIS.	O Note	d on the record
	Ω Sure Ω n page 8 of 39 of Appendix B or page			οι	MP	Q NOW	
	six of the La Capra report February 2011		10	0	мік (0 Than	k you. If we could move on then to PR-
11	date February 2011 what he discusses with		11	1		Q. THan PUB-N	NLH-002 Attachment 1 and this is the
12	respect to that date And the second bullet		12	2		AME	C report the level two condition
13	again then "Decision: the stop work order was		13	3		asses	ssment and if we could go to page three
14	lifted due to Hydro addressing the OHS		14	4		of 37	1 of Attachment 1? Now we know from IC-
15	concerns and determining new generation"		15	5		NLH-	026 that that was the response in the 2011
16	and determined. I'm sorry, "new generation		16	6		capit	al budget that the level one condition
17	options. Hydro reported this update to the		17	7		asses	ssment was expected at the end of October
18	Board" and then referred to, and I don't know		18	8		of 20	10. There's an undertaking outstanding.
19	if it's necessary to go to it, PR-PUB-NLH-003,		19	9		under	rtaking for production of that document.
20	Attachment 1, page 70 of 101. When you go to		20	0		Did a	anyone on the panel review that level one
21	that, it doesn't actually have a document		21	1		condi	ition assessment in 2015 in preparation
22	that's dated from February of 2011 or for that		22	2		for t	hese proceedings or otherwise? Has
23	matter any time in 2011 updating the Board.		23	3		anyo	ne recently looked at it?
24	Mr. LeDrew, or perhaps Mr. Henderson or Mr.		24	4 N	MR	R. LEDRE	EW:
25	Humphries might be aware, are you aware of how	V	25	5	A	A. I had	ln't.
	P	age 10					Page 12
1	the Board was updated of that information ir	1	1	1 N	MR	R. COXW	/ORTHY:
2	February of 2011?		2	2	(Q. Mr. I	Henderson?
3	MR. HENDERSON:		3	3 N	MR	R. HENDI	ERSON:
4	A. There were some emails at least. I did see an		4	4	A	A. No.	
5	email from Sam Banfield to Jim Haynes, so	I	5	5 N	MR	R. COXW	/ORTHY:
6	think via that route the Board was informed.		6	6	(Q. Mr. I	Humphries?
7	I'm not sure if there was anything that Mr.	_	7	7 N	MR	R. HUMP	HRIES:
8	Young may have written as well, but at least	I	8	8	A	A. No.	
9	know that Mr. Banfield had been in touch wi	th	9	9 N	MR	R. COXW	ORTHY:
10	Mr. Haynes.		10	0	C	Q. Do y	ou have any recollection, Mr. LeDrew, of
11	MR. COXWORTHY:		11	1		what	was in that condition assessment, in
12	Q. I don't think there's anything on the record,	L	12	2		terms	s of it's ultimate conclusion, the level
13	certainly Mr. La Capra doesn't refer to it and	L	13	3	(0.7	one?	`
14	It's not in PUB PR-PUB-NLH-003 and I would		14	4 (? 5)	(9:1 10	15 a.m.)
15	have expected if there was something that	2	15	5 IV.	MK	A Woll	ew:
10	would have been put on the record. Fou w	e	10	0 7	F	A. Well	, level one would have been a desktop
1/	get an undertaking to get a copy of that		1/	/ 0		in the	at type of equipment. So we gathered up
10	email?		10	0 0		all th	a type of equipment. So we gamered up the inspection reports and all the
$ _{20}^{1}$	MR HENDERSON:		20	0		renai	rs so we shared all that with AMEC and
$\begin{vmatrix} 20 \\ 21 \end{vmatrix}$	A Sure		$\frac{20}{21}$	1		that's	s what level one became and I would have
$\begin{vmatrix} 2 \\ 2 \\ 2 \\ 2 \\ 2 \\ 2 \\ 2 \\ 2 \\ 2 \\ 2 $	MS GLYNN		21	2		siloo4	ested they were recommending to do a more
$\left \begin{array}{c} 23 \\ 23 \end{array} \right $	O. Noted on the record.		23	-3		in-de	with analysis.
$ _{24}^{23}$	MR. COXWORTHY:		$ _{24}^{-3}$	- 4 N	MR	R. COXW	/ORTHY:
25	Q. And if it indicates obviously if there's an		25	5	(Q. But y	you don't have any specific recollection?

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1	MR. LEDREW:	1	1 on the front end.
2	A. I don't, not at this point, no.	2	2 MR. COXWORTHY:
3	MR. COXWORTHY:	3	3 Q. Again, could I have an undertaking for that
4	O. No, fair enough, fair enough. It was expected	4	4 document?
5	at the end of October 2010. Can you tell me	5	5 MR. LEDREW:
6	whether it was received within the timeframe	6	6 A. Yeah.
7	that was expected?	7	7 MR. COXWORTHY:
8	MR. LEDREW:	8	8 O. Thank you.
9	A. I would expect, yeah.	9	9 MS. GLYNN:
10	MR. COXWORTHY:	10	0 O. Noted on the record.
11	O. So the level two wasn't completed until	11	1 MR. COXWORTHY:
12	December of 2011?	12	2 O. If we could turn then to page 25 of 371 in
13	MR. LEDREW:	13	3 Attachment 1? And you'll recall, and I
14	A. Correct.	14	4 believe it was Mr. Henderson's evidence, but
15	MR. COXWORTHY:	15	5 Mr. LeDrew you may also have commented on
16	O Almost 14 months later?	16	6 this that Hydro's scope for this report was
17	MR. LEDREW:	17	7 narrow, and that's a word that Mr. Henderson
18	A Correct	18	8 used in terms of it was only intended to look
19	MR. COXWORTHY:	19	at what were the options for refurbishing or
20	0 And so if we could at page 3 of 371 if we	20	replacing the local if I can call it that
$ _{21}^{20}$	could scroll down just a little bit. I tried	21	black start capability at Holyrood, as opposed
22	reviewing this document to see if there was	22	2 to whether Holyrood needed local black start
23	any information in terms of timelines in	23	canability at all
$ _{24}^{-0}$	terms of when the level two condition	24	4 MR LEDREW
25	assessment was requested, et cetera, and the	25	5 A. That's correct.
	Page 14		Page 1
1	best I could arrive at in terms of timelines	1	1 MR COXWORTHY
$\begin{vmatrix} 1 \\ 2 \end{vmatrix}$	was the information that's on this page, which	2	2 0 And the wider question of whether having black
3	indicates a draft report was prepared but no	3	start out of Hardwoods would be a reasonable
	date provided Then a version of the final		alternative This study basis on page 1.3
5	report or a draft of the final report was	5	5 "the basis for this study is as follows: in-
6	ready apparently on the 30th of August 2011	6	6 service summer 2013 " Did Hydro specify that
7	and then a final report was not ready then	7	7 it was looking for a solution that would be in
	until December 9, 2011, Mr. LeDrew, do you	8	8 service in summer of 2013?
9	have any recollection of why it may have taken	9	9 MR LEDREW
10	from well, first of all, from October 2010	10	0 A. I think Rob. Mr. Henderson mentioned earlier
11	to August 30th. 2011 to get to a version of	11	1 that any of these options had a date that
12	the final report and second of all, why there	12	2 wasn't going to see it in -
13	was a delay then from August 30th to December	13	3 MR. COXWORTHY:
14	19th to getting to the, I guess, final final	14	4 Q. Absolutely, that was their conclusion.
15	report?	15	5 MR. LEDREW:
16	MR. LEDREW:	16	6 A. Correct.
17	A. I can't recall.	17	7 MR. COXWORTHY:
18	MR. COXWORTHY:	18	8 Q. That was their conclusion. But this is their
19	Q. Was AMEC advised or told that there was any	19	study basis. This is what they're asking
20	urgency in getting this level two condition	20	they're being asked to look at these issues,
21	assessment to Hydro?	21	but the study basis states an in service of
22	MR. LEDREW:	22	2 summer 2013. I would presume, you know, if
23	A. We would have outlined a schedule, a proposed	23	3 this proceeds, they're coming to their
24	schedule to consolidate that would normally be	24	4 conclusion as opposed to their retroactively
25	in an RFP document that we would have sent out	25	5 arriving at a study basis after they've come

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1 to a conclusion. Is that fair?		1	cost." There's been previous evidence, Mr.
2 MR. LEDREW:	2	2	Henderson, that by 2012, it had been
3 A. Yeah, you would like to it to have read	as 3	3	identified that the need to add 50 or 60
4 soon as possible, I guess is what you're -	4	4	megawatts to the Island Isolated system before
5 MR. COXWORTHY:	5	5	the in-feed, that had been identified by 2012
6 Q. Isn't it fair that IC-NLH-026 indicated that	6	6	as something that would be necessary by late
7 that's what Hydro, at least at that point, w	as 7	7	2015 at the latest. But it also had been
8 intending to do, to do things as soon as	8	8	identified and this was in November 2012
9 possible?	9	9	planning report, that regardless, regardless
10 MR. LEDREW:	10	0	of whether the Labrador in-feed and the
11 A. Yeah, that would -	11	1	Muskrat Falls sanction came down and that was
12 MR. COXWORTHY:	12	2	going to be the future of generation for the
13 Q. To address this issue. If we could turn to -	13	3	Island or going continuing down the
14 this is in the 100 megawatt CT application	n. 14	4	Isolated Island route, either way, the
15 That's one of the related applications in th	ne 15	5	preferred solution was to get a 50 or 60
16 prudence review section on the PUB websi	te. I 16	6	megawatt gas turbine to meet the anticipated
17 guess this is for Ms. Gray's assistance. S	o 17	7	load forecast for 2015. We could go to the
if we go to the actual application for the 1	00 18	8	references, but would you agree that that's
19 megawatt CT, and if we could go there'	sa 19	9	where things stood in 2012?
20 report that's attached immediately follow	ing 20	0 M	R. HENDERSON:
the application proper and page 32 of the	at 21	1	A. Subject to check, yes. Mr. Humphries might be
22 report.	22	2	able to better speak to that.
23 MS. GRAY:	23	3 M	R. COXWORTHY:
24 Q. Sorry, it's just taking a moment to load.	24	4	Q. Sure, absolutely.
25 MR. COXWORTHY:	25	5 M	R. HUMPHRIES:
	Page 18		Page 20
1 Q. Sorry?	1	1	A. Yes. At the end of 2012, the generation
2 MS. GRAY:	2	2	planning issues report that I think you're
3 Q. It's just taking a moment to load.	3	3	speaking of, indicated a requirement and at
4 MR. COXWORTHY:	4	4	that time we were looking at 50 megawatts.
5 Q. Oh no, no, no problem. No problem.	5	5 M	R. COXWORTHY:
6 MS. GRAY:	6	6	Q. And was this something that just in November
7 Q. It's a large document.	7	7	2012 came down as a thunder clap or was it
8 MR. COXWORTHY:	8	8	fair to say that earlier 2012 that the world
9 Q. Yes, it's a large document. It takes a whil	le 9	9	was orienting itself in such a way that the
10 to load.	10	0	need to obtain a gas turbine at Holyrood, 50
11 MS. GRAY:	11	1	or 60 megawatts, was becoming clear?
12 Q. Mr. Coxworthy, what page?	12	2 M	R. HUMPHRIES:
13 MR. COXWORTHY:	13	3	A. Yes, I think as we moved through 2012, the
14 Q. Page there's a report immediately after	the 14	4	requirement was becoming more.
application document proper, page 32 of	that 15	5 M	R. COXWORTHY:
16 report. So, yes, that's the report, so page	16	6	Q. And so still then on page 32 of the report
17 32 of that document. It's the combustic	on 17	7	that's attached to the 100 megawatt
18 turbines options. Yes, you've just passed	it 18	8	application, it goes on to say that "through
19 there. That's the page, thank you.	19	9	discussion and consideration of other
20 So the second full paragraph on that	20	0	modifications to aid system integration of
21 page, the one that starts "the cost estimate	s 21	1	future development, the possibility of adding
and schedules for the 60 megawatt nomination	al unit 22	2	a larger generator to aid integration with the
23 were developed and adjusted as addition	nal 23	3	HVDC link was reviewed. As well, given the
24 information was acquired. The current	60 24	4	possibility of the larger generator, it was
25 megawatt alternative is estimated at a cert	ain 25	5	natural to consider provision for future

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1	expansion adding a second turbine at some	1	1	100 megawatt, and correct me if I'm wrong.
2	point in the future could increase the plant	2	2	that's a search that would have started in
3	output to 120 megawatts." So it was always an	3	3	2014?
4	option to start at 50 or 60 megawatts in	4	4 M	IR. HUMPHRIES:
5	Holyrood and then if more was needed, a	5	5	A. Well, we had -
6	configuration could have been put in place to	6	6 M	IR. COXWORTHY:
7	make that possible?	7	7	O. After the January 2014 events?
8	MR. HUMPHRIES:	8	8 M	IR. HUMPHRIES:
9	A. Well, within step sizes, ves. You know, if we	9	9	A. No, well, we had done some research after the
10	went with initially it was a 50, it would	10	0	2013 event. So we did have some knowledge of
11	probably the expansion would be another 50	11	1	what was available size wise and feature wise.
12	or 60 on top of that. The situation we were	12	2	I would say, and no, we at that time, we
13	looking at here was a larger generator left	13	3	did not find a unit that had all the
14	the opportunity open to be able to add a	14	4	characteristics that you would look for
15	second engine at some point in the future to	15	5	ideally
16	get full capacity ves	16	, 6 М	IN COXWORTHY:
17	MR COXWORTHY.	17	7	O But that search wouldn't have started before
18	O In 2012 or prior to 2012 did Hydro take any	18	, 8	Lanuary of 2013 or thereafter?
10	steps to determine the availability of a 50 or	10	эм	AR HIMPHRIES.
$ _{20}^{1}$	60 megawatt gas turbine on the grav market I	20	0	A. It would have started after January 2013
$\begin{bmatrix} 20\\ 21 \end{bmatrix}$	think is the term that's been used not one to	20	л 1 м	A. It would have started after sandary 2015.
$\begin{bmatrix} 2 \\ 2 \\ 2 \end{bmatrix}$	he completely built for you from scratch but	21	ייי ר	O Mr Henderson in terms of the decision in
$\begin{vmatrix} 22 \\ 23 \end{vmatrix}$	like was found with the 100 megawatt one that	22	2	early 2012 to go with the Hardwoods as the
$\begin{bmatrix} 2.3 \\ 2.4 \end{bmatrix}$	had been built but was not used?	23) 1	black start solution an interim black start
$\begin{vmatrix} 24 \\ 25 \end{vmatrix}$	MD_HIMDHDIES	24	+ 5	solution for Holyrood, you've said that part
-	Dece 22			
	Page 22		1	Page 24
	A. Phot to 2012? I don't think there was a whole let of research done at that time.		1	of the fationale within Hydro was that it was
	whole lot of research done at that time.		2	anticipated that there would be the need to
3	MR. COXWORTHY:		3	load arouth by 2015 That was January 2012
	Q. Why hot?		+ ~	load glowin by 2013. That was January 2012.
3	MR. HUMPHRIES:	5	5	So is it fair to say you were anticipating or
6	A. well, A, I guess we were looking at a	6	5	Hydro was anticipating in January 2012 that it
	requirement for a 50 megawait unit to we		/	was going to be the 50 megawall of 60 megawall
8	were also looking at the possibility of	8	8	gas turbine installed at Holyrood that was
19	incorporating some of these forward flooking	9	ب ا	going to be the long term black start
	have have it has a supervised of the structure it was a supervised of the supervised of the structure it was a supervised of the supervise	10) 1 1 1	SOLUTION ?
	been available in a gray market situation.		I M	1R. HENDERSON:
$ ^{12}$	MR. COXWORTHY:	12	2	A. The generation planning expansion analysis was
13	Q. what wouldn't have been available in a gray	13	3	identifying a combustion turbine, a 50
14		14	+ ~	to 60 magazita at that time and so the
15	MR. HUMPHRIES:	15	5 6	to bo inegawaits at that time and so the
16	A. A unit with a double size generator, hall size	16	5	analysis that was done that winter in terms of
$ _{10}^{1/}$	engine, synchronous condenser capability, an	1/	/	siting of that possible new CI was for
18	of these additional features.	18	8 0 14	Holyfood.
19	MK. COAWORTHY:	19	эM о	IK. CUAWUKIHY:
$ ^{20}_{21}$	Q. 1 OU CICHI LIOOK IOF LITEM!	$ ^{20}_{21}$	J 1	Q. Sure. So willy wouldn't the search for a 50
$\begin{vmatrix} 21\\ 22 \end{vmatrix}$	MIK. NUMPHKIES:	$\begin{vmatrix} 21\\ 22 \end{vmatrix}$	1 2	turbing why wouldn't that have started in
$ _{22}^{22}$	A. INO, WE UIUII I IOOK IOF OHE.	$ ^{22}$	2	Lanuary of 20122. Of course, it wouldn't have
23	WIN, CUAWORINII	25	э 1	committed you to actually proceeding with it
$\begin{vmatrix} 24 \\ 25 \end{vmatrix}$	Q. When you went looking for later on, the	$\begin{vmatrix} 24 \\ 25 \end{vmatrix}$	+	but to see what the options were out there
120	search mat resulted in the locating of the	123	S	out to see what the options were out there.

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1	MR. HENDERSON:		1	i	f need be. So at that time, there was it	
2	A. Well, during that time, there was work b	being 2	2	v	vas the situation was not looking at a future	
3	done by the technical services group of	the 3	3	r	need so much as that there was a pressing	
4	project execution technical services divis	sion 4	4	i	mmediate need.	
5	looking at options and they would have	been 5	5 ((9:30	a.m.)	
6	accumulating information, information	from e	6]	MR. C	OXWORTHY:	
7	vendors, looking at site, all of those thing	gs 7	7	Q. I	f we could turn to and this is in PR-PUB-	
8	would have been part of the consideration	n. I 8	8	Ν	NLH-002, Attachment 1, so in the same	
9	don't know specifically as Mr. Hump	ohries 9	9	Ċ	locument, page 6 of 371, and if we could	
10	said, it's not likely that they were lookir	ng 10	0	S	croll down. And this is the AMEC report, the	
11	at gray market solution there, giving the	ne 11	1	1	evel two report, and one of the things they	
12	specifics of what Mr. Humphries was say	ying we	2	1	ooked at there in the section is the system	
13	were looking for in particular, which w	ould 13	3	f	ailure cost of each of the options that they	
14	have been a unit that would be being ab	le to 14	4	v	vere asked to look at during the period to the	
15	be expanded to a two-turbine configuration	on at 15	5	e	and of 2020. This is a function of the	
16	some point down the road.	16	6	e	expected or predicted difference in	
17	MR. COXWORTHY:	17	7	r	eliability between the options and the cost	
18	Q. So you're saying a two-turbine solution	1 had 18	8	p	er hour of the electric system blackout	
19	been one that was considered, that would	have 19	9	ċ	lisruption situation assumed to occur would be	
20	made it not possible or appropriate to us	se a 20	20	S	imilar to 1986 island blackout which lasted	
21	used when I say used, similar to the 1	21	21	а	bout 30 hours. So they look then in the	
22	megawatt situation, a gray market machi	ne? 22	22	t	able below or they summarize below the	
23	MR. HENDERSON:	23	23	i	mpacts, as I understand it, of proceeding	
24	A. I'm not saying that the I think, as Ma	r. 24	24	v	vith one of the options that they have	
25	Humphries just said, it's possible there	was 25	25	r	ecommended.	
		Page 26			Page 28	
1	something, but we there was nothing b	vrought 1	1		So they don't give us there what would	
2	to our attention that it was there and th	e 2	2	h	ave been the impact of doing nothing, from	
3	focus was getting making sure that we	e had a	3	ť	he point of view of doing nothing, of not	
4	all of the engineering good estimates	s, 2	4	r	efurbishing the local Holyrood CT, nor of	
5	scheduling and everything required to	put 5	5	p	ourchasing a new Holyrood hard I'm sorry, a	
6	forward an application to the Board for	that e	6	b	black start option. So they've given there	
7	2015 in-service date.	7	7	V	values in terms of even if the unit had been	
8	MR. COXWORTHY:	8	8	r	efurbished in accordance with their	
9	Q. Was the same effort put into looking for	what 9	9	r	ecommendations, there was still a 10 percent	
10	was out there, what was available on	the 10	0	p	probability of an outage event of failure over	
11	market in 2012 as was put into it afte	r 11	1	t	hat 2013-2020 period and they give costs in	
12	January 2013?	12	2	ť	he millions of dollars, as I would understand	
13	MR. HENDERSON:	13	3	i	t, of that type of incident occurring.	
14	A. In January 2013, with the -	14	4		Is it fair to say that the situation that	
15	MR. COXWORTHY:	15	5	ł	Holyrood was in, starting certainly from	
16	Q. Or after January 2013, sorry.	16	6	J	anuary 2012 when the decision was made that	
17	MR. HENDERSON:	17	7	1	t could no longer be utilized, even the gas	
18	A with the turbine on unit one damaged	and 18	8	t	urbine could no longer be utilized even in an	
19	knowing that we didn't have that capacit	y that 19	9	e	emergency basis, the scenario that Holyrood	
20	winter, that did cause us to have conside	rable 20	20	V	vas in, in terms of this table, was even worse	
$ ^{21}_{22}$	urgency of looking at something, becau	se we 21	21	t.	nan what this table portrays, that it would	
$ ^{22}_{22}$	were in a situation where we were down	a /0 22	22	h	ave to nave been? Because it wasn't	
23	megawan unin. So mere was a consider		.5	r	besals brought in or now or used are turbines	
$\begin{vmatrix} 24 \\ 25 \end{vmatrix}$	was anything that we could bring in qui	$\frac{1}{24}$.4 95	L L	arought in none of those options were	
123	was anything that we could bring in qui	ZKIY, 23	.)	t	rought in, none of mose options were	

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1 pursued. So does it stand to reason that the	1 CROSS-EXAMINATION BY MR. DENIS FLEMING
2 situation that Holyrood was in, in terms of if	2 MR. FLEMING:
3 AMEC had been asked to analyze it in the same	2 Q. Thank you, Mr. Chair. Nature of going last
4 way they've been asked to analyze this, would	and having most of the issues dealt with in
5 have had to have been worse?	5 great detail by those who came before me is I
6 MR. HENDERSON:	6 will jump around a little bit, but the good
7 A. I would say that AMEC did not look at the	7 news is my questions should be fairly brief.
8 picture including Hardwoods. So, you'd have	e 8 The first issue I'd like to discuss is
9 to consider that Hardwoods was an additional	9 the five-year recovery of 1.2 million dollars
10 option for a similar situation that occurred	10 in catch-up preventative maintenance on
11 in the past, and that -	breakers and transformers in 2015. And if we
12 MR. COXWORTHY:	12 could pull up V-NLH-089, Revision 1, from the
13 Q. But they would have been aware that power w	vas13GRA? We didn't ask nearly that many RFIs in
14 available from the grid to Holyrood. I mean,	14 the prudency review.
15 I know you're saying that they weren't asked	15 MS. GLYNN:
to look at that option, but surely you would	16 Q. We're having a hard time hearing you. If
17 acknowledge that they would have been aware	e of 17 you'd just -
18 that when they did this economic analysis	18 CHAIRMAN:
19 here?	19 Q. Yeah, try to -
20 MR. HENDERSON:	20 MR. FLEMING:
A. I don't know what they were aware. I can say	21 Q. That's not a complaint I hear very much.
22 that they did not if they were presented	22 CHAIRMAN:
23 with looking at I think the terms of	23 Q. Speak more directly into the mic. I think
24 reference are there. So they're looking at	24 there's a -
25 narrowly, as I previously stated, at the	25 MS. GRAY:
25 narrowly, as I previously stated, at the Pa	25 MS. GRAY: ge 30 Page 32
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 25 narrowly, as I previously stated, at the Pa, 1 Holyrood facility. They did not look at the 2 entire Avalon area and what other generation 3 was available that could be brought into bear 4 if the situation I just don't think that 5 they looked at that. 6 MR. COXWORTHY: 7 Q. So you're saying when they did this analysis, 8 economic values failure to operate 9 assumptions, that they wouldn't have taken 10 into account at all the rest of the grid? 11 MR. HENDERSON: 12 A. No, I don't think they did. I think they were 13 looking at just that plant. 14 MR. COXWORTHY: 15 Q. And we're going we have an undertaking for 16 the request for proposal, so presumably that 17 will provide us some more information, in 18 terms of the terms of reference. 19 MR. HENDERSON: 20 A. Sure. 21 MR. COXWORTHY: 22 Q. Thank you, gentlemen. I have no further 23 questions. 24 CHAIRMAN: 	25 MS. GRAY: ge 30 Page 32 1 Q. V-89? 2 MR. FLEMING: 3 Q. It is, yeah. So the request was for 1.2 4 million dollars would be recovered over five 5 years and if we look through the answer to 6 this RFI, Table 1 shows that expected costs in 7 2015 for transformers is \$411,000 and change. 8 If you go to Table 2, it shows breakers at 351 9 and change and if you go down to page three, 10 the current estimate is \$763,000 with a few 11 omissions, travel costs, that don't add up to 12 that much I understand. I also understand 13 from the RFI that it's still expected that all 14 the catch-up maintenance will be completed in 15 2015. Is that correct? 16 MR. MOORE: 17 A. Yes, that's correct. It will be completed in 18 2015. 19 MR. FLEMING: 20 Q. So the difference is just that it's costing 21 less than budgeted or estimated? 22 MR. MOORE: 23 A. Yeah, the what was included in the 2015 24 test year would have been based on the

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1 the June 2nd, 2014 reports.	1 yes.	C	
2 MR. FLEMING:	2 MR. FLEMING:		
3 Q. Right. And I have some questions on whether	3 Q. Okay. And I also under	stand that Hydro's	
4 this changes the deferral and recovery but I	4 position is that that test v	vas done or at	
5 guess that should probably be for the next	5 least, the evidence doesn'	t show that it was	
6 panel. Would that be better for the finance	6 not done?		
7 panel?	7 MR. LEDREW:		
8 MR. HENDERSON:	8 A. That's correct. I got aske	d earlier. I have	
9 A. Yes, it would be.	9 no reason to believe that i	t was not done.	
10 MR. FLEMING:	10 MR. FLEMING:		
11 O. I'd like to turn to the failure of the DC	11 O. Okav. And Ms. Greene a	sked you some questions	
12 motor at Holyrood on January 11th, 2013, And	12 about if it was done, shou	Idn't the contractor	
13 my understanding is that there was two factors	13 have found it to hit the right	sht speed during	
14 that led to that motor not reaching the	14 testing?	Sin speed during	
required speed on that date, and one of those	15 MR LEDREW:		
16 involved the maintenance contractor failing to	16 A Well there's a difference	between AC motors	
17 properly align the motor during maintenance in	17 and DC motors AC motors	will generally once	
18 2009 correct?	18 repaired reach speed D	C motors you can	
19 MR LEDREW	19 change speed by these ad	iustments that were	
20 A Actually two aspects there a neutral plane	20 discovered here through t	his investigation	
21 adjustment and the carbon brushes were	21 MR ELEMING	ns investigation.	
22 misaligned in the brush box assemblies	22 O Okay So when $$ but wh	en the maintenance was	
22 misanghed in the ordsh box assembles.	22 Q. Okay. So when but wh	be test at the end of	
24 O Okay So two mistakes during the contractor's	24 the maintenance shouldn'	It they have seen that	
24 Q. Okay. So two mistakes during the contractor s	25 it wasn't bitting the requir	red speed if it was	
Dage 2	A A A A A A A A A A A A A A A A A A A		
rage 5	4 1 miseligned?	Page 50	
1 MR. LEDREW:	1 IIISangheu ?		
2 A. COIICCI. 2 MD ELEMINC.	2 MR. LEDREW:	paction procedure if	
5 MR. FLEMING:	A the motor ween't reach	ing rated speed you	
4 Q. Okay. And Hydro views that as a major 5 contributor to the courses of the failure on	5 would have expected f	and would have gotten	
5 Contributor to the causes of the fantite off 6 Jonuary 11th 20122	5 would have expected in	L before it get returned	
7 MD LEDDEW	o picked up and corrected	before it got feturned	
/ MR. LEDREW:	/ IO US.		
8 A. The motor was turning at a slower speed	8 MR. FLEMING:		
9 undeknownist to us and that was the man	9 Q. Alid it didii t?		
10 Ianule, yes.	10 MR. LEDREW:	and now was the motor	
11 MR. FLEMING:	A. As we come to understa	ng at a lower speed	
12 Q. And Taiso understand that your contract with the service measured that service	12 was shipped to us fullin	lig at a lower speed.	
13 the service provider required that service	13 MR. FLEMING:	a whan it gave that it	
14 provider to conduct testing off the motor	14 Q. Kight. So on the involu	e when it says that it	
15 Defote it was placed back it service.	didn't do the test or t	has did the test	
10 MR. LEDREW:	incorrectly, because if i	t was missligned it	
A. Les, mey would do as found and as fell testing as the motor somes in and when it	17 incorrectly, because II 1 should have never seen	i was misangneu li	
10 testing, as the motor comes in and when it	10 MD LEDDEW	50 (
19 gets snipped out. That would be a normal	19 MR. LEDREW:	and many factors in a	
20 procedure for a service centre.	A. reall, you know, there	They have much	
21 WIK, FLEWIINU:	21 Inotor service centre.	on aquinment as there	
22 Q. And that testing would have tested whether it bit the required speed?	22 equipment and cambran	on equipment, so there	
23 Int the required speed :	23 can be numerous thim	55 mai could nave	
24 MR. LEDKEW:	indication of a page 14	at would give you all	
A. They would test it dynamically and at speed,	25 indication of a passed to	st, but in fact, it	

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1	was off its speed setting.	υ	1	1	that did not operate as intended. So, it	
2	MR. FLEMING:		2	٦	wasn't something that we were anticipating, to	
3	Q. So they could get a false positive test?		3	1	be quite honest and sincere.	
4	MR. LEDREW:		4	MR. F	LEMING:	
5	A. Yes. They have a number of equipment the	ere,	5	Q.]	Fair enough. They may have a good track	
6	would take measurements and adjustments.	All	6	1	record, but what I'm getting at is it seems on	
7	of that equipment has to be calibrated to		7	t	this motor they didn't complete the test	
8	validate the repair is meeting the		8	(correctly. They misaligned it and the test	
9	expectation.		9	(couldn't have been conducted correctly,	
10	MR. FLEMING:		10	1	because had it been, the issue would have	
11	Q. So if they got it tested, said it was reaching		11	5	shown up before it left their shop.	
12	speed, but it wasn't, you're saying it could		12	MR. L	EDREW:	
13	have been because their equipment wasn'	't	13	A.]	Right. So what you've said there is that the	
14	calibrated correctly that was doing the test?		14	t	test must have been done incorrectly. So the	
15	MR. LEDREW:		15]	point that was asked, whether they had done a	
16	A. Yeah, many factors that they would be		16	t	test or not, and I believe or had no reason to	
17	providing to us that we would not have		17	1	believe that they did not execute a test, but	
18	capability to execute ourselves, yes.		18	t	the readings that were recorded or observed or	
19	MR. FLEMING:		19	1	measured at the time were incorrect, and it	
20	Q. But again, that would be a problem with the	ir	20	1	got shipped out and sent to us and we put it	
21	testing procedure that they don't have the		21	i	into our plant.	
22	testing procedure calibrated correctly?		22	MR. F	LEMING:	
23	MR. LEDREW:		23	Q	And to be clear, this line of questioning, I'm	
24	A. Yeah, that would be in their end of the deal,		24	1	not trying to get at whether Hydro should have	
25	that would be, yeah.		25	(doubted whether the test was done or whether	
	Ι	Page 38			Page 40	
1	MR. FLEMING:	C	1	j	it was done correctly, but I'm just my	
2	Q. So if the test was done by the contractor, it		2	f	suggestion is that the evidence shows that the	
3	was done incorrectly?		3	1	test clearly was done incorrectly or not done,	
4	MR. LEDREW:		4	(one of those two. There's no other there's	
5	A. Well, again, I can't project what how we		5	1	no option in which they did it completely	
6	ended up with a wrong speed reading. I reall	y	6	(correctly, they had everything calibrated	
7	don't know. I know there can be many theo	ries	7	(correctly and they still got a number that was	
8	on it, but I don't have an answer for you at		8	t	false, but -	
9	this point in time.		9	MR. L	EDREW:	
10	MR. FLEMING:		10	A. 5	Something about the testing process at the	
11	Q. So do you see any scenario in which the		11	t	facility went awry. That's a fair statement.	
12	contractor acted met every standard you		12]	I believe that.	
13	would expect? Their equipment is properl	У	13	MR. F	LEMING:	
14	calibrated. They've done everything		14	Q. (Okay. If I could turn to the contract with	
15	correctly. They've run the test, but it still		15	t	the contractor? It's at PR-PUB-NLH-182,	
16	fails to meet speed, despite the fact its		16		Section 1.11 and I believe it's on page 7 of	
17	misaligned?		17		31 of the RFI. Just up one, I think. So this	
18	MR. LEDREW:		18	5	section down a little bit more required	
19	A. I think I gave evidence earlier in the process		19	t	the vendor to carry a commercial general	
20	that we have this contractor is providing		20]	liability policy in the amount of one million	
21	services to all the major industrial clients		21	(dollars and they had to show proof that they	
22	in the province and we have had many years	of	22	1	had that insurance before they were awarded	
23	engagement with this one and others in the	2	23	t	the contract. As I read the contract, I would	
24	local marketplace and we have never, in m	ıy	24	t	think one of the purposes in having this	
25	recollection, been sent back a repaired motor	r	25	1	requirement is to ensure that should something	

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1	go wrong with the vendor where they cause a	, I	1	MR. HENDE	RSON:
2	problem that there's funds available in the		2	A. No, I	don't think so.
3	event that Hydro has to start a legal action		3	MR. LEDRE	W:
4	against them to recover damages suffered as a		4	A. No.	
5	result of the vendor's negligence or breach of		5	MR. MOORE	:
6	contract. I guess not breach of contract		6	A. No.	
7	probably wouldn't be covered by that policy.		7	MR. HUMPH	RIES:
8	but certainly negligence. Would you agree		8	A. No.	
9	that that would be one of the purposes in		9	MR. FLEMIN	IG:
10	including that insurance clause in the	1	0	0 Okav	Do you know if there was a report
	contract?	1	1	genera	ated after the review?
12	(9·45 a m)	1	2	MR LEDRE	w.
12	MR LEDREW	1	3	A Oh ve	s we would have done a report. It would
11	A Veah many of our contracts would have the	1	1	have k	been change that all happened inside our
14	standard set of wording in our clauses and	1	5	long t	erm asset planning role. That would be
15	general conditions	1	5	a fund	amental role of that group
10	me el emino.	1	7		
1/	O So in this case was any claim made against	1	0	O I'd lik	a an undertaking to get a conv of that
10	the contractors based on the fact that they	1	0	Q. I u lik	t think it's on the record
19	sont the motor, back as testing along when it		9	I UUII	
$ _{21}^{20}$	sent the motor back as testing okay when it		20	MK. HENDE	RSON:
$\begin{vmatrix} 21\\ 22 \end{vmatrix}$	ND LEDDEW		21	A. Call y	ou just de specific and make sure mat we
$ ^{22}$	MR. LEDREW:	1-	22	give y	00 -
23	A. To my knowledge there was no claim put back	K 2	23	MR. FLEMIN	
24	towards the service provider.	2	24	Q. It's in	PR-PUB-NLH-179. There s an indication
25	MR. FLEMING:		25	It st	ates that Hydro completed a complete
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1	Q. Do you know why not?		1	review	of its asset management practices in
2	MR. LEDREW:		2	2011,	including an analysis of the practices
3	A. No, I wasn't party to those conversations.		3	of othe	er utilities across North America. I
4	MR. FLEMING:		4	don't	think I have the number messed up, 179.
5	Q. Do you know if there's any litigation		5	MR. HENDE	RSON:
6	outstanding from the events of January 2013 or	·	6	A. So thi	s would be specific I'm just trying
7	2014, either by Hydro or against?		7	to ma	ke sure I got the right scope here.
8	MR. LEDREW:		8	Becau	se there would have been reviews done at
9	A. Not that I'm aware of.		9	differe	ent many different locations of
10	MR. HENDERSON:	1	0	Hydro	's facilities, so it's specifically to
11	A. No, there's none that I'm aware of. I would	1	1	Holyre	ood, I assume?
12	say that there isn't any.	1	2	MR. FLEMIN	IG:
13	MR. FLEMING:	1	3	Q. Yeah,	I took it as probably one report
14	Q. Okay. At various times during the testimony	1	4	genera	tted at the end of this review, but if
15	over last week, there was discussion about	1	5	it's are	ea specific -
16	changes in testing and documentation methods	5 1	6	MR. HENDE	RSON:
17	that Hydro has implemented since the events of	f 1	7	A. There	were reviews done for many aspects of
18	January 2013 and 2014. I also note in	1	8	the op	eration in a number of different areas.
19	response to one of the RFIs, and we don't need	1	9	So the	-
20	to pull it up, but it's PR-PUB-NLH-179, it's	2	20	MR. FLEMIN	IG:
21	indicated that Hydro completed a review of its	2	21	Q. Well,	I'd like to see the one for Holyrood for
22	asset management practices in 2011 and that	2	22	sure.	I don't know if that would have covered
23	included an analysis of practices across North	2	23	prever	ntative maintenance programs in general.
24	America. Was anyone on the panel involved in	n 2	24	MR. HENDE	RSON:
25	that review?	2	25	A. I think	t it would have.

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 MR. LEDREW: A. Yes, it would have. 	 Q. Yeah, but I believe y spoke to other utilities 	ou just said you never s after the event. So
3 MR. FLEMING:	3 do you have a knowle	dge that that's what other
4 Q. Then I'd like to see that as well. And I'm	4 utilities are doing or a	re you surmising that
5 just going down through here. Yeah, I think	5 they would have been	following the same?
6 if I got those two areas, that would cover	6 MR. LEDREW:	
7 what I'm looking for.	7 A. In my previous career	, I worked with Ontario
8 MS. GLYNN:	8 Power and they had a	fleet of thermal plants
9 Q. The undertaking is accepted?	9 as well, so I was fami	liar with that process,
10 MR. HENDERSON:	but no, I didn't do an	exhaustive -
11 A. Yes.	1 MR. FLEMING:	
12 MS. GLYNN:	Q. And they were testing	these motors in the same
13 Q. Noted on the record.	3 way you were testing	them before the events of
14 MR. FLEMING:	4 January 2013?	
15 Q. I'd just like to go briefly through a few of	5 MR. LEDREW:	
16 the changes that have been made. One of the	A. The weekly online tes	st was to validate that on
17 changes involved testing of the DC motor we	falling pressure that	the standby and the
18 just discussed at Holyrood, and I understand	emergency pumps v	vould start on falling
19 that before these events, the motor would be	9 pressure and falling	pressure could be
20 tested weekly, but it would be tested just to	20 could happen as a res	sult of loss of power,
21 see if it would turn on when required. it	loss of flow, lots of fa	actors would pick up
22 wasn't tested to see if it would work as	that failure mode.	
23 required. But now you test for both as part of	23 MR. FLEMING:	
24 your weekly procedure?	Q. You named the person	in who developed the new
25 MR. LEDREW:	25 test. The name is eluc	ling me right now.
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1 A. The weekly, yes, is looking at that.	1 MR. LEDREW:	
2 MR. FLEMING:	2 A. Yeah. Well, the we	ekly test would be
3 Q. When you were developing the new test, did you	3 primarily driven by th	e operations group, so
4 have an opportunity to canvas other utilities	4 the individual that we	build have been at the
5 across North America to see what the standard	5 centre of it was the c	Special Coloring Colo
6 was at the time for testing these type of	6 fellow by the name of	Evan Cabot.
7 motors?	7 MR. FLEMING:	adaptating for one
8 MR. LEDREW:	8 Q. I d like to get an u	hoertaking for any
9 A. I would have anticipated the people involved	9 correspondence, any c	a new test that relates
inquire or read env correspondence to that	to what the industry of	tenderd was at the time
11 Inquire of read any correspondence to that	1 to what the industry's	wara doing in North
12 EFIECT.	A morizo	vere doing in North
13 MR. FLEMING.	America.	
15 standard was in January 2013 for testing these	4 MR. LEDREW.	entioned to you at the
16 type of motors?	time it would have be	en a joint effort of the
17 MR LEDREW:	7 operations manager p	lus the lead investigator
18 A. I think the tests that we were doing prior to	8 who was involved in	this process out of our
19 this event would have been the industry	9 technical service side	of our engineering
20 standard. That was the OEM recommendations	20 group in corporate. S	o there was a couple of
and would suggest to you, most folks were	participants here that	would have been in a
doing what we were doing, were executing the	consultative process	developing the new
23 weekly test in the manner in which the OEM had	23 process.	
24 described to execute it.	24 MR. FLEMING:	
25 MR. FLEMING:	Q. And I'm not concerne	ed with who developed the

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	1 test. Just I'd like to know whether there was	1	1	able to identify the work to be done through
	2 any inquiries made, any documentation that	2	2	corrective maintenance and tracking that
	3 shows in 2012 other jurisdictions were already	1	3	performance.
	4 doing these tests.	4	4 N	IR. FLEMING:
	5 MR. LEDREW:	5	5	O. You do the same things now, you just have -
	6 A. Okay.	6	6	would you consider it a better process now
	7 MS. GLYNN:	7	7	than you had before 20103?
	8 0. The undertaking is noted on the record.	8	8 N	IR. HENDERSON:
	9 MR. FLEMING:	9	9	A. I would say, yes, we do have a better process
1	Q. One of the other changes that's been discussed	10	0	now.
1	is changes to how you document preventative	11	1 N	IR. FLEMING:
1	maintenance deferrals, and I understand that	12	2	Q. If that process had been in place prior to
1	now you say the same decision making criteria	13	3	2013, do you think that the preventative
1	goes into a decision to defer preventative	14	4	maintenance backlog would have been addressed
1	maintenance, but the reporting structure and	15	5	earlier?
1	the documentation is more rigorous, correct?	16	6 N	IR. HENDERSON:
1	17 MR. HENDERSON:	17	7	A. I can't say - what was happening prior to 2013
1	18 A. Yes.	18	8	was a concerted effort to get the backlog -
1	19 MR. FLEMING:	19	9	the preventative maintenance that had been
2	Q. Do you know if what Hydro was doing for	20	0	deferred, and I probably should try to stay
2	tracking backlog of preventative maintenance	21	1	away from the backlog because the backlog
2	22 was consistent with what other utilities in	22	2	includes corrective maintenance, there's a lot
2	North America were doing back in 2013?	23	3	of things in the backlog that would normally
2	24 MR. HENDERSON:	24	.4	for any business that has facilities like
2	A. I don't know what other utilities were doing	25	.5	ours, they would have backlogs that basically
	Page 5	0		Page 52
	1 with respect to tracking backlog other than	1	1	is a list of work to be done, but the
	2 they do track them. They would have their own	2	2	preventative maintenance was under a working
	3 tools that they would use for tracking that.	3	3	through a process to get that deferred
	4 MR. FLEMING:	4	4	maintenance and preventative maintenance
	5 Q. Do you know if after these events when you	5	5	completed, and in 2013, I think as Mr. Moore
	6 were developing the new procedure whether	6	6	has described, there was a lot work that came
	7 other utilities were canvassed to find out	7	7	into play that became a higher priority that
	8 what the industry practice was?	8	8	resulted in it being deferred.
	9 MR. HENDERSON:	9	9 N	IR. FLEMING:
1	A. I don't recall that there was anything. We	10	0	Q. And I understand there's evidence on the
1	were looking at the tools that we had. We	11	1	reasons it was deferred. What I'm getting at,
1	12 were already tracking our backlogs, and so	12	2	though, is do you think if you had that same
1	13 what we had done is that we said that we would	13	3	reporting structure, written reports weekly,
1	14 in terms of tracking the PM, preventative	14	4	the documentation was different, do you feel
	15 maintenance work, is that we would put	15	5	that there might have been in 2013 with this
	specific emphasis on that so any deferred	16	6	reporting, someone might have said we have to
	17 preventative maintenance would be documented	17	7	address this earlier than -
	and there would be clear documentation on the		8 M	1K. HENDERSON:
	bookloge I think there's different resting	19	9	A. I would suggest it would have been much more, I'll say proparticely dealt with in the same
	20 backlogs, I unit interes anterent practices	20	.U 1	i in say, proactively dealt with in the sense
	different areas you know recordless of		.1	and that's why we made the change that we did
	industry of tracking the backloss and we did	22	.∠ •2 •	and that's why we made the change that we did.
	2.5 muusu y of tracking the backlogs, and we did	23	.5 IV. 14	O The same undertaking Laskad for the last
	regularly to understand what's there to be	24	/+ /5	change I don't know if there would be any
Ľ		23		change, i don i know ii diele would de ally

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1	documentation that anyone canvassed utilities	1	1	the mechanism yourself to catch up to what was
2	across North America after these events to	2	2	the industry standard?
3	find out what they were doing with		3 MI	R. MOORE:
4	preventative maintenance and whether there was	4	4	A. It's quite possible, but I do know when we did
5	a better procedure or an industry standard	4	5	the asset maintenance review that we just
6	procedure that Hydro wasn't following,	6	6	talked about, you know, talking to other
7	recognizing from your answer there may be		7	utilities would have been part of that review
8	nothing, but if there is anything, I'd like to	8	8	as well at that time, and we've already
9	see it.	ģ	9	agreed, I guess, to supply that report as an
10	MR. HENDERSON:	10	0	undertaking.
11	A. We can look into that, but I'm pretty	11	1 MI	R. FLEMING:
12	confident that this was just a method to be	12	2	Q. You did. Who developed the procedure to put
13	able to keep track and report every week what	13	3	the new valves in the bottom of each phase of
14	preventative maintenance was done each week,	14	4	the breaker and to open them before they went
15	and that's all being tracked in our	15	5	back into service?
16	maintenance management system which is a	16	5 MI	R. MOORE:
17	computerized system which keeps track of all	17	7	A. That typically would be done by our long term
18	the maintenance work done, when it's due, that	18	8	asset planning group.
19	sort of thing.	19	9 MI	R. FLEMING:
20	MR. FLEMING:	20	0	Q. Do you know who did it in this case? I know
21	Q. If there was any canvassing of other utilities	21	1	typically, but do you know did they do that in
22	to see what they were doing, I'd like to see	22	2	this instance?
23	the results of that inquiry.	23	3 MI	R. MOORE:
24	MS. GLYNN:	24	4 -	A. It was an action that was recommended as part
25	Q. Noted on the record.	25	<u> </u>	of the root cause failure analysis that we did
	Page	54		Page 56
1	MR. FLEMING:	1	1	on the breaker. I'd have to check to get an -
2	Q. Another change you discussed involved breaker	2	2	are you looking for the name of who actually
3	maintenance such that now before a breaker is		3	made the recommendation'?
4	placed back in service, new drains were	4	4 MI	R. FLEMING:
5	installed, and the drain will be open to make		5	Q. I'm not looking for the name necessarily, but
6	sure there's no moisture in the breaker before	6	5	it's the same kind of undertaking, and I
	it's put back in service. Do you know if		/	didn't expect to ask for this many
8	utilities were doing that?		8 0	developing this new test whether you
9	MP_MOOPE.	10	ታ 0	conversed other jurisdictions and found that
	MR. MOORE:	11	J 1	this is something other people, are doing and
	that but again we're going to as part of the	11	1 ว	Hydro is just -
$ ^{12}_{13}$	undertaking supply the 2011 asset maintenance	12	2 3 MI	R MOORE
14	review that was done but there was nothing to	1/	2 WH	A It would have been out long term asset
15	indicate that we needed to change our process	14	- 5	nlanning manager who would have made that
16	at that time to include that drain. That was	16	6	decision and ultimately the change to the
17	a change that we made as a result of our root	17	7	preventative maintenance tactic, and I do know
18	cause failure investigation of that breaker.	18	8	at the time there was a discussion with other
19	MR. FLEMING:	19	9	utilities with respect to the frequency of
20	O. And I put it to you, it could be in 2011 or it	20	0	preventative maintenance on those types of
21	could have been something you found out after	21	1	equipment, so he may have talked to the
22	the events of 2013 and 2014 when you were	22	2	utilities about that particular specific item
23	looking at new tests, you could have canvassed	23	3	to check the drain valve.
24	other utilities and found out that this is	24	4 MJ	R. FLEMING:
25	what other people are doing, so you installed	25	5	Q. Okay.

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1 MR. MOORE: 1 the weather event. It r	nay not necessarily be
2 A. I do know he did talk to other utilities with 2 just Holyrood.	5
3 respect to our six year frequency and did a 3 MR. FLEMING:	
4 bit of a comparison there. 4 Q. Fair enough.	
5 MR. FLEMING: 5 MR. MOORE:	
6 Q. I'd like the undertaking for that 6 A. But any of our infras	structure, any of our
7 documentation as well that relates to changes 7 facilities where the	weather forecast is
8 to the test on the breakers and what his 8 coming, we will look	k at key locations to
9 canvassing of other utilities to see what they 9 station people that car	n respond if any events
10 were doing. 10 do come up.	· ·
11 MR. MOORE: 11 MR. FLEMING:	
12 A. Okay. I know the new procedure that we use is 12 Q. Again the same questi	ion, do you know if other
13 part of an existing RFI. 13 utilities were already	doing that in 2013?
14 MR. FLEMING: 14 MR. MOORE:	C
15 Q. The new procedure - I'm not concerned what the 15 A. I'm not sure if other	utilities were doing
16 new procedure is, I'm concerned about whether 16 that or not.	C
17 other utilities were already doing that 17 MR. FLEMING:	
procedure prior to the events of January 2013 [18 Q. Not aware of any co	onversations with other
19 and 2014. 19 utilities or any canvas	sing of other utilities
20 MR. MOORE: 20 to see if that was a sta	indard procedure to put
21 A. Yeah, we can take that away and find out if we 21 technicians in semi-re	mote locations when bad
did consult with other utilities and what 22 weather was called for	r?
discussion may have been had with respect to 23 MR. MOORE:	
24 the drain valve. 24 A. No specific conversat	ions that I can recall or
25 (10:00 a.m.) 25 aware of.	
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1 MS. GLYNN:	
2 0. Noted on the record. 2 Q. I guess, to be consistent	ent. I'll ask for an
3 MR FLEMING: 3 undertaking whether t	here was any inquiry from
4 0. The last such change - unfortunately, not my 4 other utilities as to	whether that was
5 last question, but the last such change is the 5 standard practice in of	ther iurisdictions?
6 January 2013 issues at Holyrood, I understand 6 MR. MOORE:	
7 that they were exacerbated a little bit by bad 7 A. Like, I do know that	t. for example. storm
8 weather and personnel not being able to get to 8 response and storm pr	reparation is obviously a
9 the Holvrood station so some changes were 9 big issue with all ut	tilities, and every
10 made that now when vou're calling for 10 utility. I'm sure, as y	we do as well. have
inclement weather, certain key personnel will 11 protocols in place to r	nake sure that they are
be stationed at Holvrood throughout the event 12 prepared for storm even	ents. I mean. I've heard
13 to make sure that access doesn't cause a 13 presentations maybe a	at conferences and those
14 problem in the future, is that correct?	t other utilities do. but
15 MR LEDREW: 15 to say we went out an	d specifically canvassed
16 A Placed on standby, right. 16 other utilities to get	copies of their
17 MR MOORE: 17 protocols to compare	against ours - we were
18 A Well. I will say that we look at each - there 18 well aware of what No	ewfoundland Power had in
19 is a protocol in place now where we do 19 place and we also talk	with Newfoundland Power
20 planning for each weather event that's 20 regularly with respect	t to joint response to
forecasted and depending on where the weather 21 storms so that, you ki	now we can help each
22 system may be heading or where the worst 22 other out depending	on the nature of the
23 forecast may be we will look at stationing 23 event.	on the nuture of the
24 key people in any location that would be 24 MR FLEMING:	I
25 helpful, I guess, for response depending on 25 O. And I'm not asking y	you to conduct such an

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1 analysis now. I'm just saying if the 2 information is there if it was done when you	1	Q. Right, when you got the September 2013 readings at Suppyside of 11 was there a
3 were redeveloping these tests I'd like to see	3	conversation with the manufacturer at that
4 what the results were	4	point about going in and doing a test to
5 MR. MOORE:	5	confirm that it's coming from the tap changer?
6 A. Yeah, we can provide that because I do know	6 M	R. MOORE:
7 part of it as well is the - like, when you	7	A. I got to go back, and I think we've already
8 look at the North American Electrical	8	listed this as an undertaking, go back and
9 Reliability Council type standards, NERC	9	validate when we actually consulted with the
10 standards, we did look at the NERC standard	10	manufacturer when we got that reading first,
11 for preparation and response to storms and	11	and I will find that out.
12 compare against what we were doing, so I would	12 MI	R. FLEMING:
13 say that NERC would certainly be a compilation	13	Q. I actually don't recall either. One of my
14 of what most of the North American utilities	14	questions was when did you have conversations
15 are doing. We did compare against that	15	with the manufacturer, and I understood you
standard and I can provide you with some	16	had conversations throughout time in the 90s
17 detail on that.	17	while these levels were -
18 MR. FLEMING:	18 MI	R. MOORE:
19 Q. And did NERC require personnel to be placed at	19	A. There is an undertaking actually on the record
a station if bad weather is being called for?	20	to provide all communication and consultation
21 MR. MOORE:	21	we had with ABB on this transformer before and
A. I don't think it got down to those specifics.	22	after the failure.
23 MR. FLEMING:	23 MI	R. FLEMING:
24 Q. Okay.	24	Q. I must have missed that somehow.
25 MS. GLYNN:	25 MI	R. MOORE:
Page 6	2	Page 64
1 Q. We'll note the undertaking on the record.	1	A. We've agreed to dig that out.
2 MR. FLEMING:	2 MI	R. FLEMING:
3 Q. The failure of 11 at Sunnyside, most of the	3	Q. That should answer the questions Thave. In
4 questions i had were asked by other counsel, 5 but Livet, want to turn to the October 20th	4	the Sunnyside transformer between Sontember
6 transcript and it's the very last page page	5	2013 and when it failed?
7 208 Mr Moore was asked a question There	7 MI	2015 and when it failed :
8 was a question about how far the acetylene gas	8	A No because I think as we explained too as
9 numbers had gone up and on the very last	9	well like at the time we were in the process
answer it says. "We can look at the exact	10	of having - we've already talked about how we
11 data. I do remember one year it was 10, and	11	were in the process of having to defer some of
12 like I mentioned, our equipment manufacturer	12	our preventative maintenance due to the higher
13 indicated that these levels are, in their	13	priority break in work, so the ability to
14 opinion, is coming from the tap changer	14	dismantle and do an internal inspection on
15 compartment and the monitoring that we've been	15	that transformer between September and the end
16 doing was the recommended course of action,	16	of the year was just not possible with the
and at some planned opportunity we could go in	17	resources we have before us. It would have
18 and do a test to validate that this is	18	had to have been something that we would have
19 actually happening". I understand that test	19	planned into the next maintenance season, but,
20 was subsequently done at Stony Brook?	20	of course, we didn't get the opportunity in
21 MR. MOORE:	21	the next maintenance season because the
A. That's correct, it was done on a transformer	22	transformer failed in January.
at Stony Brook, which was the same design,	23 MI	R. FLEMING:
24 age, and rating.	24	Q. That's the same thing that happened with the
25 MR. FLEMING:	25	retesting of the gas level, you said it would

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1	have been pushed off to 2014?	_	1	1 would have been and what decision we could
2	MR. MOORE:		2	2 have made at the time, but we do go back to
3	A. It would have been done. Once our equipment		3	3 Doble Engineering to look at our past readings
4	engineer done the analysis and looked at the		4	4 and they did indicate from their review of the
5	recommendation, you know, would have schedule	d	5	5 data that the bushings did look good. We've
6	a retest, which we didn't get the opportunity		6	6 already talked about 2007 when the last test
7	to do.		7	7 was done. We didn't have a 2013 test for the
8	MR. FLEMING:		8	8 reasons we talked about, I guess, to reference
9	Q. The same transformer, there was a discussion		9	9 as well.
10	about the power factor test that would have		10	0 MR. FLEMING:
11	been done as part of the preventative		11	1 Q. Given that it failed in January 2014, are they
12	maintenance program had that been done on the		12	2 able to deduce what the test likely would have
13	six year cycle for that transformer, and you		13	3 shown in September 2013 had it been completed?
14	were asked by Ms. Greene if that test would		14	4 MR. MOORE:
15	have shown problems with the bushings, the		15	5 A. No, they weren't able to do that.
16	response was, and we can go to the transcript		16	6 MR. FLEMING:
17	if you want, but the response was it's not a		17	7 Q. Okay, you would expect to me that if you're on
18	pass/fail test, but what I didn't get is had		18	8 a spectrum and something is about to fail or
19	the test - had the power factor test been		19	9 it fails three months later, the test would
20	done, would it have given you a numerical		20	0 show that it's a very poor reading, but I
21	reading somewhere on a spectrum as to what's		21	1 don't understand these tests maybe.
22	happening with the bushings?		22	2 MR. HENDERSON:
23	MR. MOORE:		23	3 A. Yeah, maybe - it is a test that shows the
24	A. Yeah, it would. Like I mentioned, the actual		24	4 power factor of the insulation. It basically
25	test does measure the condition of the		25	5 gives you an indication of whether the
	Pa	age 66		Page 68
1	bushings and you monitor the readings over	•	1	1 condition of the insulator has changed
2	time, and typically in consultation with Doble	•	2	2 relative to the previous measurement of that,
3	Engineering to determine, you know, how we	ell	3	and so it's something that you trend over
4	the bushings are performing over time and if		4	4 time, but you can have a sudden change and a
5	there is degradation showing over time such		5	5 failure. It doesn't - the insulators can
6	that you could plan for the appropriate		6	6 break down suddenly rather than just gradually
7	replacement in your long term plan, but it		7	7 deteriorate. It's quite possible that the
8	normally doesn't give a value that's sort of,		8	8 test wouldn't have shown it, and it's possible
9	like we mentioned, pass/fail, it's a longer		9	9 it may have shown a trend that may have said
10	term condition monitoring reading.		10	0 let's do another test earlier than the six
11	MR. FLEMING:		11	1 year PM, or may have said, well, what you
12	Q. But to me, that almost sounds more specific		12	2 should do is plan for a replacement of those
13	than pass/fail. Pass/fail is 50/50.		13	3 bushings down the road, but it's not - as
14	MR. MOORE:		14	4 Darren said, it's not a pass/fail, it does
15	A. Right.		15	5 show a trending, but it doesn't necessarily
16	MR. FLEMING:		16	6 always all the insulators trend in a
17	Q. Whereas what you're getting is more of on a	1	17	7 particular way that would say, well, if it
18	spectrum, so if something it about to fail, it		18	8 failed, you extrapolate back and get another
19	almost sounds like you're expected to get a		19	9 reading. It can take a sudden shift.
20	very low rating?		20	0 MR. FLEMING:
21	MR. MOORE:		21	1 Q. And you give two options there as to what it
22	A. Yeah, like, if we had gotten - if we were able		22	2 could have shown. It could have shown that
23	to actually complete that piece of maintenance	e	23	3 everything was okay, but then it failed
24	in September 2013, I mean, it's purely		24	4 suddenly, catastrophic failure, anyway. It
25	speculation, I guess, to say what that reading		25	5 could have shown that there's a trend and it's

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1	something to look into. Is there a third	1	eight?	Ç
2	option that it could have shown that the	2	MR. MOORE:	
3	insulation is severely degraded and it should	3	A. That's rig	ht, we've talked about how that can
4	be replaced now?	4	happen if	unknown higher priority work for out
5	MR. HENDERSON:	5	customers	comes up in a given year and we end
6	A. It's possible that it could result in an	6	up having	to re-prioritize our maintenance
7	immediate replacement. Our experience has	7	because o	f that, so, yes, it can happen, as
8	generally been we schedule the replacement at	8	we've tall	ked about.
9	a later point.	9	MR. FLEMING:	
10	MR. FLEMING:	10	Q. And there	e's no documented red flag number
11	Q. But we don't know what the test would have	11	where if i	t hits seven years, eight years, it
12	shown because the test would not have -	12	has to be	done that year, no questions asked?
13	MR. HENDERSON:	13	MR. MOORE:	
14	A. That's correct.	14	A. No, there	s no drop dead number documented.
15	MR. FLEMING:	15	MR. FLEMING:	
16	Q. The six year maintenance plan, in general, I	16	Q. You also	discussed at length the reasons that
17	understand in 2009 a decision was made to	17	the plan w	asn't followed in 2010, 2011, 2012,
18	adopt a six year maintenance plan, a	18	2013, it g	ot behind for some reasons that
19	preventative maintenance plan. Does a six	19	you've ex	plained in detail. Do you know if
20	year preventative maintenance plan require	20	there was	vacancies in the maintenance
21	that a transformer or breaker be maintained	21	departmen	nts between 2010 and 2013 that
22	within six years, like, is six years the	22	contribute	ed to the inability to meet the
23	maximum you should go under that type of plan?	23	preventati	ve maintenance schedule?
24	MR. MOORE:	24	MR. MOORE:	
25	A. Normally the way it's done is what we would	25	A. We don't	have anything documented to indicate
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1	look at is any breakers or transformers that	1	that there	would have been an exceptionally
2	are coming due in that six year cycle would be	2	high num	ber of vacancies that may have driven
3	scheduled into the annual work plan for that	3	us to caus	e deferrals of maintenance, but, I
4	year, so it doesn't necessarily mean that, you	4	guess, wh	at got us into a situation of re-
5	know, if the six years was up at, say, March,	5	prioritizin	g and deferring some of our
6	that we would have to do it in March. It	6	maintenar	nce would have been the unknown break
7	would just be done in that annual work	7	in work th	at came into our annual work plan
8	planning year.	8	that was o	f a high priority, but I can't say
9	MR. FLEMING:	9	that an ex	ceptional number of vacancies was
10	Q. Give or take, it's within a year?	10	one of the	root causes.
11	MR. MOORE:	11	MR. FLEMING:	
12	A. Right.	12	Q. Would va	cancies be tracked for the four crews
13	MR. FLEMING:	13	across the	island that do this maintenance?
14	Q. Within a calendar year, okay. Is there a	14	MR. MOORE:	
15	defined maximum in that plan as to a	15	A. Yes, that'	s an ongoing item that we do track
16	transformer or breaker cannot go above seven	16	and an o	ongoing recruitment effort when
17	years, eight years, whatever the number is?	17	vacancies	do come up.
18	MR. MOORE:	18	MR. FLEMING:	
19	A. We don't have that number actually documented,	19	Q. There is a	lot of information on the record
20	no, as a maximum. What we try to do and what	20	about vac	ancies, but I'm not familiar whether
21	we like to do is comply with our schedule that	21	there's an	y breakdown of what the vacancies
22	we set forward.	22	were in e	each of these maintenance crews
23	MR. FLEMING:	23	between	2009 and 2014. If it is on the
24	Q. But as we've seen, that doesn't always happen,	24	record, th	en that's fine. If you could point
25	so there are times when six years turns into	25	me to it th	at would be great; if not, I'd like

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 to get an undertaking to see w rate was for - MR. MOORE: A. I'm not sure if it's on the rec detailed vacancy rates in the departments for those years. documented in RFIs the FTEs don't know if we documented rates for those years. I'm no top of my head. MR. FLEMING: Q. Can I get an undertaking to h MR. MOORE: A. Yes, we certainly can. MS. GLYNN: Q. Noted on the record. (10:15 a.m.) MR. FLEMING: Q. During testimony there was a about - some of the answers, 7 record, I'm trying not to, to sa about it was 2014 when you f evidence to put together an ap 	what the vacancy ord there for ise particular I do know we per shop, but I I per shop vacancy t sure off the ave those? 11 12 13 14 15 16 17 18 19 11 11 12 13 14 15 16 17 18 19 11 12 13 14 15 16 17 18 19 111 112 113 114 115 116 117 118 119 111 111 112 113 114 115 116 <th>1 2 3 4 5 6 MR. F 7 A. 8 9 0 MR. F 3 A. 4 MR. F 5 Q. 6 7 8 9 0 1 2 3 4</th> <th>needed, but as I think through it, there would have been no application needed, I think you just said, had you hired outside contractors in 2010 and 2011 to make sure you're on schedule? IENDERSON: The only application we would make is if it was extraordinary, which would be a significant dollar amount. ILEMING: \$500,000.00 or so is the number - IENDERSON: I think that's the threshold. I think that's the threshold. I think that's the threshold. I think that is the threshold. I think that few questions I have involve operating temperatures of breakers and the suggestion that low temperatures may have led to some of the undiagnosed failures that are under consideration. If I could turn to PUB- NLH-004. I understand from the answer that the manufacturer rates the acceptable operating temperature of between -40 and -50, but several utilities in Canada have found that the accentable operating temperature is</th>	1 2 3 4 5 6 MR. F 7 A. 8 9 0 MR. F 3 A. 4 MR. F 5 Q. 6 7 8 9 0 1 2 3 4	needed, but as I think through it, there would have been no application needed, I think you just said, had you hired outside contractors in 2010 and 2011 to make sure you're on schedule? IENDERSON: The only application we would make is if it was extraordinary, which would be a significant dollar amount. ILEMING: \$500,000.00 or so is the number - IENDERSON: I think that's the threshold. I think that's the threshold. I think that's the threshold. I think that is the threshold. I think that few questions I have involve operating temperatures of breakers and the suggestion that low temperatures may have led to some of the undiagnosed failures that are under consideration. If I could turn to PUB- NLH-004. I understand from the answer that the manufacturer rates the acceptable operating temperature of between -40 and -50, but several utilities in Canada have found that the accentable operating temperature is	
Board - Hydro's position wasan application to the Board to	catch up on the 22	4 5	actually somewhat lower than -40, and you list	
 maintenance in 2014 and 20 have been any reason betwe that you would have needed t for approval to hire an outside make sure that you were st preventative maintenance sch MR. HENDERSON: A. There wouldn't be any reason Board. It's an operating exp company had. If it was an expense, then we have made at Board for extraordinary expense 	Page 74 15. Would there en 2010 and 2013 o go to the Board e contractor to taying on the edule? on to go to the ense that the extraordinary application to the inses, but we were,	1 2 3 4 5 MR. N 6 A. 7 8 9 0 1 2	Page 76 two utilities there that have put restrictions on those breakers when the temperatures are lower. One uses -10 as a threshold, one uses -20. Who uses -10, do you know? MOORE: What I will say is when we consulted with the other utilities and talked about some of the operating temperatures for those breakers through our utility contacts, they were very free to share the information, but they did ask that we not document the actual names of the utilities on the record.	
 as Darren has said, througher as Darren has said, througher within the operating budgets in was expected that we would making progress on getting al accordance with that recovery MR. FLEMING: Q. It was expected, but it wasn' the first couple of years of the MR. HENDERSON: A. That's right. MR. FLEMING: Q. When I read the transcript, impression that maybe an a 	Instant we were,	 3 MR. F 4 Q. 5 MR. N 6 A. 7 8 9 MR. F 0 Q. 1 2 3 4 5 	 TLEMING: Okay. MOORE: I don't know if that's the right way to put it, but they were very free to share the information, but they were hesitant to - TLEMING: They didn't want to put their name on the record. Not a lot turns on it, so that's okay. Does the manufacturer stand by -40, despite the fact that some utilities are putting restrictions on them and as low as - 10? 	

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1	MR. MOORE:	1	1 temperatures after the failure of B1L03?	
2	A. We don't have anything from the manufacturer	2	2 MR. MOORE:	
3	to indicate otherwise, other than when we did	3	A. That's when we would have dug into it, yes, as	
4	bring in ABB to help us with the failure	4	4 the root cause failure analysis report	
5	investigation on the breaker in Sunnyside,	5	5 indicated.	
6	B1L03, they did make some comments that were	6	6 MR. FLEMING:	
7	included in the root cause failure analysis	7	7 Q. There was a little bit of discussion there	
8	report of March, 2014, and I can read out one	8	8 about what actually happens when its cold,	
9	of their quotes if that'll help, the opinion	9	9 what mechanism of the breaker fails, and could	
10	they gave us.	10	10 you repeat that? Sorry, what do they say	
11	MR. FLEMING:	11	11 happens when it's cold to the breaker?	
12	Q. Sure.	12	12 MR. MOORE:	
13	MR. MOORE:	13	13 A. What they're saying, they're talking about the	
14	A. They said, "The testing showed indications	14	14 - like, a breaker has three poles, I guess,	
15	that the mechanism could be affected by colder	15	three phases, A, B, and C, and they're talking	
16	temperatures in the condition they were found.	16	about the actual pole control boxes that may	
17	How much is difficult to determine. The exact	17	be impacted by cold temperatures. They kind	
18	field condition of the pole boxes during the	18	18 of indicate that it could be slow operation.	
19	event could not be replicated". That's one	19	19 MR. FLEMING:	
20	opinion that they offered on that breaker.	20	20 Q. Do you know if there's any link between a slow	
21	MR. FLEMING:	21	21 operation and cold temperatures and a breaker	
22	Q. Okay.	22	22 being behind on its preventative maintenance?	
23	MR. MOORE:	23	23 MR. MOORE:	
24	A. And the second quote that they put in the	24	A. No, not that I'm aware of that we could draw	
25	report was, "I believe that the three pole	25	25 the conclusion that maintenance schedules	
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1	control boxes on the B1L03 breakers did not	1	1 would have any impact on what they found here.	
2	unlatch when the trip command was sent during	2	2 MR. FLEMING:	
3	the event. I believe that the cold	3	3 Q. No discussion, and I can't remember the -	
4	temperatures that the breaker was experiencing	4	4 there's no discussion from them that if a	
5	for days up to the event and the condition of	5	5 properly maintained breaker is going to	
6	the pole control boxes are factors affecting	6	6 operate better on a cold temperature than one	
7	the breaker operation. The pole control boxes	7	7 that's behind its maintenance?	
8	should have operated under these conditions,	8	8 MR. MOORE:	
9	but maybe slow". That was an opinion that the	9	9 A. No, that wasn't even documented as a -	
10	manufacturer had at the time, so I guess	10	10 MR. FLEMING:	
11	they're not saying that they're not standing	11	11 Q. Based on the mechanism of failure, do you	
12	by, I guess, their operating temperature	12	12 think that preventative maintenance would have	
13	range, but in the same breath they're saying	13	13 had any effect on that type of failure?	
14	that the colder temperatures may affect	14	14 MR. MOORE:	
15	operation of the breakers, so it's just a may,	15	15 A. Not from the investigation that we did. We	
16	it's not conclusive -	16	16 didn't find anything conclusive to indicate	
17	MR. FLEMING:	17	17 that if we had have completed the maintenance	
18	Q. They're standing by it, but not very strongly.	18	in the fall of 2013, that that would have	
19	They don't seem to be very strong in their	19	19 definitely resulted in that breaker operating	
20	opinion any more that it's good to -40.	20	20 properly. That breaker did operate properly	
21	MR. MOORE:	21	in 2013 on two occasions when we checked back	
22	A. It's an opinion, right, it's an opinion.	22	22 through our records. It opened and closed as	
23	MR. FLEMING:	23	23 it should have in 2013. Like I indicated in	
24	Q. Did you first become aware of this issue with	24	24 PUB-NLH-174, there's a long list of	
25	breakers not operating at these colder	25	25 preventative maintenance that's carried out in	

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1	a terminal station, everything from monthly to	1	1	from six years to four years may be very few
2	quarterly to annual checks, and the six year	2	2	because of the replacement program that's
3	PM is basically one portion of the maintenance	3	3	happening in parallel.
4	that we do on these items, and it was the six	4	4 M	IR. FLEMING:
5	year that was due in 2013 that we had to defer	5	5	Q. Okay, any restrictions put on the breakers
6	into 2014.	6	6	like the other unnamed jurisdictions?
7	MR. FLEMING:	7	7 M	IR. MOORE:
8	Q. I understand. I'm just wondering whether	8	8	A. No, none that we're aware of other than what
9	there's anything in that preventative	9	9	we documented.
10	maintenance that would have increased the	10	0 M	IR. FLEMING:
11	ability of the breaker to work in a cold	11	1	Q. Nothing Hydro has - you haven't put any
12	temperature?	12	2	restrictions on the breakers like the other
13	MR. MOORE:	13	3	two jurisdictions.
14	A. No.	14	4 M	IR. MOORE:
15	MR. FLEMING:	15	5	A. No, we haven't, no.
16	Q. Did the manufacturer recommend any actions	16	6 M	IR. FLEMING:
17	that you take now that you know that this -40	17	7	Q. Thank you. Those are all my questions.
18	rating isn't - it's not a rating that says	18	8 C	HAIRMAN:
19	this will work perfectly up to -40, and then	19	9	Q. Okay, I think I'm going to - where am I going?
20	start to break down. It seems to me to be	20	0	I'm confused.
21	something that says it'll operate in -40, but	21	1 M	IS. GLYNN:
22	it'll start to break down - its ability to	22	2	Q. If there's any questions from the
23	operate will break down at much higher	23	3	Commissioners.
24	temperatures than that?	24	4 C	HAIRMAN:
25	MR. MOORE:	25	.5	Q. Commissioners, yes.
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1	A. No, there was nothing that they recommended	1	1 M	IS. GLYNN:
2	with respect to a change in our maintenance	2	2	Q. We're finished, and then there is some re-
3	tactic. Now we have made some changes to	3	3	direct from Hydro once the Commissioners are
4	maintenance on air blast circuit breakers,	4	4	finished.
5	such that we've changed it to a four year	5	5 C	HAIRMAN:
6	cycle from a six year cycle, but they didn't	6	6	Q. Yes. Do you have any questions?
7	recommend anything specific from a change in	7	7 C	ROSS-EXAMINATION BY VICE-CHAIR WHALEN:
8	our maintenance tactic because of the	8	8	Q. I have a question that's probably just for
9	investigation that they completed on that	9	9	clarification, I think. Do I understand that
10	breaker.	10	0	you've moved from a six year maintenance plan
11	MR. FLEMING:	11	1	to a four year maintenance plan for your
12	Q. Do you think that change from six years to	12	2	breakers and your transformer?
13	four years will have any effect on the	13	3 M	IR. MOORE:
14	breakers ability to operate in low	14	4	A. No, just for air blast circuit breakers.
15	temperatures?	15	5 V	ICE-CHAIR WHALEN:
16	MR. MOORE:	16	6	Q. Just for your breakers, okay. That was a
17	A. I don't think it will other than the reason	17	7	misunderstanding then, and how many breakers
18	we're doing it is because the breakers are	18	8	do you have?
19	aging and we feel that, you know, it's	19	9 M	IR. MOORE:
20	diligent, I guess, to increase our maintenance	20	0	A. Originally we had - back in early 2014, there
21	cycle on this aging asset. We probably won't	21	1	would have been 63 air blast circuit breakers.
22	see that much change when it comes to actually	22	2	That number is somewhat reduced and is being
23	doing the maintenance because we're also into	23	3	reduced as we speak because we're in the
24	an accelerated replacement program, so the	24	.4	middle of a replacement program, so we may be
25	number of breakers that will actually change	25	.5	down to somewhere around 55 air blast circuit

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1	breakers now at this point.	1	l	existing breakers complete	ed?
2	VICE-CHAIR WHALEN:	2	2 MR	MOORE:	
3	Q. So there's some actually being taken out,	3	3 4	A. That's correct.	
4	removed or -	4	I VIC	CE-CHAIR WHALEN:	
5	MR. MOORE:	5	5 (Q. For 2014/2015?	
6	A. Yeah, being replaced with the SF6 technology.	6	5 MR	MOORE:	
7	VICE-CHAIR WHALEN:	7	1 A	A. And power transformers.	
8	Q. Okay.	8	3 VIC	CE-CHAIR WHALEN:	
9	MR. MOORE:	9) (Q. And the transformers. Is t	hat done? Are you
10	A. So as we speak, there's one being done in	10)	fully recovered on the six	year -
11	Holyrood today, right.	11	MR	. MOORE:	•
12	VICE-CHAIR WHALEN:	12	2 4	A. Yeah.	
13	Q. Will those breakers also, though, kick into a	13	3 VIC	CE-CHAIR WHALEN:	
14	four year maintenance -	14	4 (Q. This will be the six year	cycle backlog,
15	MR. MOORE:	15	5	right?	v <u>-</u>
16	A. No, they'll be a six year cycle.	16	5 MR	. MOORE:	
17	VICE-CHAIR WHALEN:	17		A. By December 1st, which i	s quickly approaching,
18	Q. They'll be on a six year cycle. So the four	18	3	we will be completed on	air blast circuit
19	years for your existing breakers.	19)	breakers and power transfe	ormers.
20	MR. MOORE:	20) VIC	CE-CHAIR WHALEN:	
21	A. Existing air blast circuit breakers.	21	(Q. And could you just take	me through very
22	VICE-CHAIR WHALEN:	22	2	briefly what actions did H	ydro have to take to
23	Q. And the new ones that are going in will be on	23	3	get that done, because, I g	uess, you're doing
24	a six year?	24	ł	that recovery in addition	to doing your
25	MR. MOORE:	25	5	ongoing scheduled mainte	nance?
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1	A. That's correct.	1	MR	. MOORE:	-
2	VICE-CHAIR WHALEN:	2	2 4	A. Right.	
3	Q. Okay.	3	3 VIC	CE-CHAIR WHALEN:	
4	MR. LEDREW:	4	1 (Q. So you're running - what o	did you have to do?
5	A. And they use a different gas extinguishing	5	5 MR	. MOORE:	
6	mechanism than air. They use SF6, an inert	6	5 A	A. In 2014, we used several	different tactics.
7	gas, so it's a complete new design.	7	7	We hired some additional	temporary employees
8	VICE-CHAIR WHALEN:	8	3	and if I speak to just the a	ir blast circuit
9	Q. So the plan is to replace all 63 air blast	9)	breakers, what we did for	or the air blast
10	circuit breakers with these new -	10)	circuit breakers, we br	ought in the
11	MR. MOORE:	11		manufacturer to work with	1 our crews and put in
12	A. That's correct, yes.	12	2	an accelerated schedule t	o go around and
13	VICE-CHAIR WHALEN:	13	3	complete the maintenance	on air blast circuit
14	Q. And what's the time frame for that?	14	ł	breakers through 2014/20	15. In 2014, for
15	MR. MOORE:	15	5	power transformers, we br	ought in a contractor
16	A. The schedule right now is to have it all	16	5	to actually go out and wo	ork in some of our
17	complete by the end of 2020.	17	7	stations under the supervis	sion of one of our
18	VICE-CHAIR WHALEN:	18	}	employees to do additio	onal preventative
19	Q. 2020, okay. I understand that you had an	19)	maintenance on power tran	nsformers. Now into
20	accelerated maintenance program in place since	20)	2015, we actually just focu	used on - because we
21	early last spring, 2014, I'm assuming.	21	l	accomplished so much, I	I guess, with the
22	MR. MOORE:	22	2	contractor in 2014, that for	r the remainder of
23	A. Yes.	23	3	the work in 2015, we're a	able to do it with
24	VICE-CHAIR WHALEN:	24	ł	hiring temporary employe	es to assist with - to
25	Q. To get the backlogged maintenance on the	25	5	enhance our workforce to	get it done.

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1	VICE-CHAIR WHALEN:	U	1		program by the end of 2015, so I can say that
2	Q. So is it Hydro's plan to continue to use		2		we would have implemented these changes.
3	contractors for backlogs that may occur in th	e	3		Would they have been all implemented as
4	future?		4		quickly as they were without the January 2014
5	MR. MOORE:		5		outages; maybe not as quickly, but as a
6	A. Only if required, but at the end of 2015,		6		continual improvement of our program, we
7	we'll be back to, I guess, square one might b	e	7		definitely would have been looking at the
8	the right way to put it. In our planning		8		changes that we put forward, but maybe not on
9	moving forward, we wouldn't be bringing	in	9		such an accelerated schedule, might be a fair
10	contractors for maintenance unless it was		10		way to put it.
11	absolutely necessary.		11	VICE	E-CHAIR WHALEN:
12	VICE-CHAIR WHALEN:		12	Q.	Mr. Henderson, I just have one question for
13	Q. So your plan going forward is to have no		13		you. In your role as Vice President, do you
14	backlog preventative maintenance?		14		think that the preventative maintenance issues
15	MR. MOORE:		15		that have been discussed over the last number
16	A. That's correct, to meet our schedule, and our	•	16		of days had any impact on Hydro's operations?
17	annual work planning and the 2014/2015 te	st	17	MR. I	HENDERSON:
18	year reflects, I guess, a workforce that will		18	A.	I'm not sure exactly what you mean by "had any
19	accomplish - will allow us to complete that		19		impact". In terms of the deferral of
20	going forward. That's assuming that no		20		maintenance, is that - you just said. Maybe
21	unplanned work comes that we're not aware	e of	21		you could repeat the question, and I'll just
22	that may take us off plan because that can		22		see if I can -
23	happen in any year, but we won't be using	5	23	VICE	C-CHAIR WHALEN:
24	contactors unless the need arises, shall we		24	Q.	The issues that have been discussed in respect
25	say, right, for maintenance.		25		of the specific assets at Sunnyside, Holyrood,
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1	VICE-CHAIR WHALEN:		1		Western Avalon, in particular, and also the
2	Q. And just listening to - certainly Mr. Fleming		2		whole overriding issue, I guess, of the
3	brought you through a number of the thing	S	3		backlog of maintenance and the deferral of and
4	that have changed since January 2014.		4		what I've classified as re-prioritizing what
5	MR. MOORE:		5		you've already told us is priority work,
6	A. Yes.		6		because other work comes along, all those
17	VICE-CHAIR WHALEN:		7		things, did that have any impact on Hydro's
8	Q. I was just jotting them down. There is testing		8		operations, vis-a-vis, I thinking in
9	documentation, you've actually taken specifi		9	(10.2	particular of the outages?
	action to do your catch up work, you re doin	g	10	(10:3	JU A.III.)
	veer cycle, on the new 100 percent torget	our	11	MR. I	HENDERSON:
12	completion. I mean there was a whole bur	ah	12	A.	connection with what happened in January 2014
13	of things. If we hadn't had the outages		13		specifically with respect to the Supposide
14	would any of these changes have gone int	2	14		transformer failure or the breaker
15	nlace?	0	15		misoperations that were the result of deferred
17	MR MOORE		17		maintenance We've certainly through that
18	A I would - my understanding is that we would	h	18		review identified that there was this
19	because we're always trying to improve ou	ir	19		accumulated deferred maintenance that had to
20	asset management program, and the tools th	at	20		be addressed, and was being addressed, had a
$ _{21}^{-3}$	we're using now to track on a weekly basis of	of	21		plan in place, but there was nothing at all
$ _{22}$	our annual work plan, and some of the change	ges.	22		that we were able to find - we did a verv
23	like I say, we've made to our maintenance	, , ;	23		extensive investigation to find out because we
24	cycles, and we've been very much committe	d to	24		were obviously very concerned about what
25	completing the remainder of our recovery	, 	25		happened and wanted to understand what

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1	happened to make sure that it did	in't happen	1	COMMISSIONER OXFORD:
2	again, and the investigation did no	ot identify	2	Q. I do have one question for Mr. LeDrew with
3	anything that said there was this	piece of	3	regards to the infamous pump and the new
4	maintenance that hadn't been dor	ie, and as a	4	testing procedures that you've put in place
5	result that's what caused the failur	re, and we	5	since that time, and I think, okay, your
6	brought in independent people to	be able to do	6	testimony indicates that the secondary pump is
7	that to ensure that there was no in	ternal bias	7	tested on a regular basis now for the PSI
8	and make sure that we had some	external eyes	8	that's happening, okay, with that pump, you're
9	on this to ensure it, and there wa	s nothing	9	doing that on a regular basis. These pumps, I
10	that came out of the investigation	that tied 1	10	understand, are in place to provide both
11	those failures in Sunnyside to the	e deferred 1	11	lubrication to the system and for cooling. So
12	maintenance. Similarly, with the	breaker in 1	12	in testing for PSI, that's one aspect of it,
13	Western Avalon, which we identify	fied after some 1	13	however, that doesn't guarantee the volume of
14	analysis what was happening the	here that 1	14	flow for the cooling aspect of it.
15	resulted in the tap changer compared	rtment damage 1	15	MR. LEDREW:
16	on the Western Avalon transfo	rmer, that 1	16	A. Right.
17	breaker worked fine before and w	worked fine 1	17	COMMISSIONER OXFORD:
18	after, so there was nothing identified	ied through 1	18	Q. So are we also testing - in addition to the
19	the review of the work on it that	it was a 1	19	PSI, are we testing for the level and volume
20	maintenance issue. That day it ob	viously did 2	20	of flow in that system?
21	not work, but we weren't able to r	eplicate it 2	21	MR. LEDREW:
22	to tie it back to a particular mair	itenance 2	22	A. Some good points there. Yes, with the varying
23	activity. That was what our whol	le objective 2	23	temperatures on that machine near 1000
24	was to find out what was the issue	e here and 2	24	degrees, you have to provide adequate
25	why did this happen, and there w	as nothing 2	25	lubrication so that the rotating parts and the
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1	identified there. So that's whe	ere our	1	stationary parts are lubricated, and there's
2	investigation landed. Of course, w	ve wanted to	2	also heat that has to be dealt with and that
3	get the maintenance back on sche	dule. That	3	lubricating oil provides the lubrication plus
4	was identified by our own team to	say, listen,	4	it removes the heat out of the bearing. That
5	you know, we need to make a	priority of	5	comes back to a tank and we have a temperature
6	getting this back on track which	we did in	6	control system in the oil tank itself that
7	2014 and 2015, but that's the nub	of it for	7	actually cools and hits the target temperature
8	us. There was nothing there the	nat was	8	on the upside, so that's part of it as well is
9	specifically identified. The break	er, B1L17,	9	that there's temperature alarms on that tank
10	that one we reviewed how down	in Holyrood we 1	10	that will give you positive confirmation that
11	had - how we went about the ma	aintenance on 1	11	you're returning oil at target temperature
12	that, and we identified that there	was a 1	12	back up to remove heat.
13	weakness in that program where	we introduced 1	13	COMMISSIONER OXFORD:
14	now putting the drain valve on to	ensure that 1	14	Q. That's all the questions I have.
15	we get the water - if there is any w	vater that 1	15	CROSS-EXAMINATION BY CHAIRMAN WELLS:
16	gets in while the breaker is disman	ntled, that 1	16	CHAIRMAN:
17	it's identified and drained. So that	t was one 1	17	Q. I've got a quick question respecting January
18	thing that did change our ma	intenance 1	18	2013. Did you lose complete snowclearing to
19	activities or practices, not so muc	h of the	19	the plant, were the plows taken off the main
20	routine, it was an enhancement to	1 t that we 2	20	road and nobody could get down to the plant as
21	identified.	2	21	well to plow around the plant?
22	VICE-CHAIR WHALEN:	2	22	MR. LEDREW:
23	Q. That's all I have. Thank you ve	ery much, 2	23	A. On that day, we have a contract at the station
$ ^{24}_{2-}$	panei.	2	24	that when incoming snow storms are coming
25	CROSS-EXAMINATION BY COMMISSION	ER OXFORD: 2	25	because we have employees there 24/7, we have

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1	a requirement to keep the roads clear i	n the 1	1	A.I w	as trying to follow you along, and I
2	event you have a medical emerger	icy or 2	2	cou	ldn't see where - I'm sorry, I was looking
3	anything, so we had our own contrac	tor in 3	3	at th	ne wrong side.
4	there with two large pieces of equipme	nt that	4]	MR. LEDF	REW:
5	was constantly plowing through the	storm 5	5	A. Ove	er here, left hand side.
6	event. When the outages happened, we	directed 6	6]	MR. HENI	DERSON:
7	that contractor to plow the province's	road 7	7	A. Lef	t hand side.
8	from the generating plant up to Route	e 60, 8	8]	MR. MAC	DOUGALL:
9	which is about three kilometres of road	d that 9	9	Q. So t	the discussion from lines 11 to 15 was all
10	had drifted in solid. So we had done	that 10	0	arou	and March of 2012.
11	piece and then the Department of Hi	ghways 11	1]	MR. HENI	DERSON:
12	later on late that morning or early after	noon 12	2	A. Yes	i.
13	finally had enough of Route 60 cleared	that we	3]	MR. MAC	DOUGALL:
14	could actually get people up to the top	of the 14	4	Q. But	then, I think, Mr. O'Brien in putting his
15	access road and then down to the ter	minal 15	5	que	stion forward referred to April of 2010,
16	station itself. So a really rare event the	at 16	6	and	you just simply said that would be right.
17	you physically couldn't get a vehicle the	rough 17	7	My	understanding was that that discussion of -
18	a stretch of -	18	8	that	the question posed was likely to have
19	CHAIRMAN:	19	9	rete	rred to April of 2012, just to clarify the
20	Q. There was nobody, like, trapped in	the 20	0	reco	ord?
21	building because of a lack of snow clea	aring? 21	1]	MR. HENI	DERSON:
22	MR. LEDREW:	22	2	A. Tha	t's right.
23	A. No, we had a contractor there the whole	e period 23	31	MR. MAC	DOUGALL:
24	of time trying to maintain and keep t	those 24	4 -	Q. Tha	nk you. Could we now pull up PUB-013 in
25	routes open around the facility.	25	5	tne	black start application, and Mis. Greene
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1	CHAIRMAN:	1	1	rete	rred to this, and if we could go to
2	Q. All right, thank you very much. Is then	re any 2	2	Atta	ichment 6, page 1 of 2. Mr. Henderson, if
3	re-direct?	3	3	you Ma	could look at the first paragraph there,
4	MR. MACDOUGALL:	T 11-	4 -	IVIS.	Greene read the second sentence to you and
5	Q. Yes, Mr. Chair, just a lew questions.	Thank 5	5	sne	said, "As it says there, we are
6	YOU.		6 7		Counting reliability for cost . nowever,
0	RE-DIRECT EXAMINATION BY MR. MACDOUG	iALL:	/ 0	at u	le time sne didn't fead in the second
0	MR. MACDUUGALL:	comint (ð	som the	ence which commute, nowever, i unink
	for October 28th and if we could go	to the 10	ሃ ባ	the	roliability banafits" I was wondering if
	hottom of page 224 Here Mr Hende		U 1	VOU	could maybe explain the statement there
$ _{12}^{11}$	were being asked some questions ab	17 out the 17	ו ר	the	second part indicating the view that the
12	siting for the new CT at Holyrood an	d Mr 12	∠ २	cost	t differential was probably not worth the
14	O'Brien at line 17 asked. "Okay, and	d Ms 14	5 4	relia	ahility henefits?
15	Greene had taken you through some ϵ	mails as	ד קי	MR HENI	DERSON.
16	well, one of which. I think, was from	Mr. 16	6	A. Wh	at I would have been saying - the analysis
17	Havnes to you. Mr. Henderson, that	really 17	7	that	I was presented indicated that there was
18	seemed to - around April of 2010 that	vou were 18	8	a si	gnificant additional cost to go into what
19	focused on Holyrood as the site, does	that 19	9	woi	Ild be referred to as a green field site,
20	sound about right". Now the discussio	n up to 20	0	and	, therefore, that would have brought -
21	then was around 2012, and I believe	e Mr. 21	1	goir	ig to the east end of St. John's would have
22	O'Brien put to you that date and you sa	aid that 22	2	broi	ught some level of reliability improvements
23	would be right, but was that the date	that 23	3	for,	I would suggest, customers in the east
24	that occurred or was it April of 2012?	24	4	end	of St. John's, which would then be closer
25	MR. HENDERSON:	25	5	to a	generating source. The primary reason

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1	for the CT was system capacity requirements		1	in a little greater deta	ail the similarities	
2	and when you look at the incremental cost for	2	2	between Stony Brook	T2 and Sunnyside T1?	
3	that benefit, I would say that you'd have to	3	3 M	R. MOORE:	2	
4	weigh all of that out and say, okay, well, the	4	4	A. Yes, I can. The transf	former in Stony Brook was	
5	incremental cost for that reliability benefit	4	5	of the same age and c	lesign and rating as the	
6	of having that in the east end of St. John's	6	6	transformer that's in	Sunnyside, and we've	
7	was probably not worth the cost that you'd	7	7	been tracking gas lev	els in that transformer	
8	incur for that, which the incremental cost	8	8	since the early 1990s	in the same manner as we	
9	relative to having it at the Holyrood site.	9	9	have been tracking	gas levels in the	
10	MR. MACDOUGALL:	10	0	transformer in Sunny	yside, so when we were	
11	Q. Thank you. If we could now pull up PR-PUB-	11	1	speaking with the	manufacturer of that	
12	NLH-200, and if we could go to Table 1 and	12	2	transformer and the	y were explaining and	
13	here, Mr. LeDrew, I'm going to ask you a	13	3	giving us their opinic	on as to typically where	
14	question or two with respect to Table 1 in	14	4	we would see those l	levels of gassing coming	
15	this response. We've had a lot of discussion	15	5	from the tap chang	ger compartment, they	
16	about the DC portion of the overall lube oil	16	6	suggested that we sho	ould go in and actually do	
17	system, which we've discussed has two	17	7	a test in a transforme	r to definitely validate	
18	potential AC redundant systems and the DC	18	8	that that phenomena	a does happen and can	
19	component. With respect to the overall lube	19	9	happen. So our oppor	rtunity, I guess, to look	
20	oil system, can you explain to the Board what	20	0	at a transformer that	's exactly the same as	
21	this data shows with respect to the	21	1	the transformer in Su	unnyside and physically	
22	availability of that system prior to the	22	2	verify that those leve	ls of gas can get from	
23	January 2013 events and its operating	23	3	one compartment into	o the other and that it's a	
24	experience?	24	4	normal operation of	that transformer was on	
25	MR. LEDREW:	25	5	the Sunnyside unit.	The transformer - I	
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1	A. Can we just go up one page just to read. Okay.	1	1	should say Stony Bro	ook. The transformer in	
2	so this is showing successful transfers.	2	2	Sunnyside had failed	, so we actually couldn't	
3	Going back down now, this is showing	3	3	go in and do that, so	our opportunity to go in	
4	successful transfers going from the primary	4	4	and look at an exactly	y the same transformer in	
5	lube oil system to the standby when the unit	4	5	Stony Brook prese	nted itself in our	
6	would come out of production and you'd go to	6	6	maintenance plan, so	that we could validate	
7	your standby system on both units.	7	7	that that was actually	happening.	
8	MR. MACDOUGALL:	8	8 M	R. MACDOUGALL:		
9	Q. And what was the operating experience from	9	9	Q. Thank you very muc	ch, Mr. Moore. I couldn't	
10	1990 until January 2013 with respect to the	10	0	find a re-direct questi	ion for Mr. Humphries,	
11	overall system in that regard?	11	1	Mr. Chair, so that's a	ll of my re-direct.	
12	MR. LEDREW:	12	2 CH	HAIRMAN:		
13	A. That worked as designed.	13	3	Q. You're a failed lawy	yer if you can't find	
14	MR. MACDOUGALL:	14	4	another question.	•	
15	Q. And was there any time prior to January, 2013,	15	5 M	R. MACDOUGALL:		
16	that it did not?	16	6	Q. I am, Mr. Chair.		
17	MR. LEDREW:	17	7 (1	0:45 a.m.)		
18	A. No.	18	8 CI	HAIRMAN:		
19	MR. MACDOUGALL:	19	9	Q. Given the hour, I wo	uld suggest, but, I mean,	
20	Q. Thank you. Mr. Moore, I'm just going to ask	20	0	if there's a storm of	of disapproval, I'll	
21	you a couple of questions. Board counsel	21	1	chicken out, but I thi	ink we should take our	
22	appeared through her questioning to continue	22	2	half hour break now.	Is that acceptable?	
23	to have concerns about why one would use Stony	23	3 M	R. MACDOUGALL:		
24	Brook T2 to validate gas and issues at	24	4	Q. Yes, Mr. Chair, abso	lutely.	
25	Sunnyside T1, and could you just maybe explain	25	5 (R	ECESS)		

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1	(11:25 a.m.)	1		history to the Board with respect to both your
2	CHAIRMAN:	2		specific experience with electric utilities
3	Q. I think we're over to you, Mr. MacDougall, to	3		and your consulting experience?
4	introduce your next panel.	4	MR.	DIDOMENICO:
5	MR. MACDOUGALL:	5	А	. Certainly. I've been in the utility industry
6	Q. Thank you very much, Mr. Chair. Mr. Chair,	6		now for just about 40 years. The first 20
7	our next panel is two gentlemen. Closest to	7		years of my career were exclusively working in
8	the Board is Mr. Phil DiDomenico, and next to	8		the utility industry, working for both
9	him is his colleague, Mr. John Athas. The two	9		Baltimore Gas and Electric and Boston Edison.
10	gentlemen work for La Capra Associates Inc.	10		The second half of my career has been in
11	I'm just going to very briefly discuss their	11		consulting to that very same electric utility
12	background and have them qualified. Before we	e 12		industry. My areas of expertise, or the
13	do that, maybe we could have both of the	13		positions that I've held rather that are
14	gentlemen sworn, Mr. Chair.	14		directly related to what we're doing here
15	MR. PHILLIP DIDOMENICO (SWORN)	15		today is at one point I had the role of
16	MR. JOHN ATHAS (SWORN)	16		Performance and Reliability Coordinator for
17	DIRECT-EXAMINATION BY MR. MACDOUGALL:	17		Boston Edison, which was a fleet of 3000
18	MR. MACDOUGALL:	18		megawatts worth of fossil generating units.
19	Q. Thank you, Mr. Chair. Mr. Chair, on August	19		My responsibilities there were basically to
20	7th, Hydro filed its reply evidence and	20		track the performance of those units and
21	Appendix "B" to that document is the reply	21		report to the Department of Public Utilities
22	evidence of La Capra. Hydro's reply evidence	22		at the time on their performance and issues
23	was revised on September 23rd, but there were	23		that arose, how were they addressed, basically
24	no revisions made to the La Capra portion of	24		defend the operation as being a prudent
25	that evidence, so Ms. Gray has pulled up page	25		operation. I did that for a period of three
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1	24 of 39 of Appendix "B" of that reply	1		years. Subsequent to that, I've been involved
2	evidence, which contains in Appendix "A" to	2		in advising utilities relative to their
3	Appendix "B", the resumes of Mr. DiDomenic	co 3		generating fleet, their operations, the
4	and Mr. Athas. Again these have been prefiled	4		management of the generating fleet, how they
5	and their extensive resumes have been with the	5		should address various issues, whether it be
6	Board and parties for some time. I'm not	6		investment and capital spending, or operations
7	going to go through them in any detail, but	7		and maintenance.
8	just to briefly introduce their experience to	8	MR.	MACDOUGALL:
9	the Board, I would like to turn first to page	9	Q	. Thank you very much, Mr. DiDomenico. Now
10	31 of 39 with respect to Mr. DiDomenico, and	10		maybe if we could have Mr. Athas do the same,
11	if we could go down to the bottom of that, Ms.	11		so Ms. Gray, if we could go to page 38 of 39,
12	Gray, and Mr. DiDomenico, my understandin	lg 12		and if we could stop there. Mr. Athas, I
13	from your CV, here we see at the bottom, and	13		understand that you have a Bachelor's Degree
14	maybe we can go over to the top of the next	14		in Mechanical Engineering, Masters of Science
15	page, your education includes an MBA in	15		and Mechanical Engineering, and a Masters of
16	Management from Loyola College, and also a	1 16		Business Administration, is that correct?
	Bachelor of Science and Electrical Engineering		MR.	ATHAS:
18	Power Systems from Northeastern University,	18	A	. That's correct.
19		19	MR.	MACDOUGALL:
$ _{21}^{20}$	MR. DIDUMENICU:	20	Q	And could you also briefly describe your
$\begin{vmatrix} 21\\ 22 \end{vmatrix}$	A. CUITCH.			specific electric unity experience and your
$\begin{vmatrix} 22\\ 22 \end{vmatrix}$	MIN. MACDOUGALL.		(11.	consuming experience:
23	Ms Gray thank you very much and maybe yo	23	(11. MP	атнаs.
$\frac{24}{25}$	can just briefly describe your employment	24	A	. With a strikingly similar time table to my

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1	colleague, Mr. DiDomenico, I've been involved	1	1 MR. DIDOMENICO:
2	with the electric power and utility industry	2	2 A. They are.
3	for almost 40 years, and about half of that	3	3 MR. ATHAS:
4	for Northeast Utilities, 19 years to be exact,	4	4 A. Yes, they are.
5	and since that time I've been with two	5	5 MR. MACDOUGALL:
6	research - two consulting firms, research	6	6 Q. And do you adopt them as your evidence in this
7	firms, Cambridge Energy Research Associates,	7	7 proceeding?
8	and La Capra Associates since 2006, but my	8	8 MR. DIDOMENICO:
9	time at Northeast Utilities, which is a	9	9 A. I do.
10	foundation for a lot of my La Capra work as	10	0 MR. ATHAS:
11	well had various positions in planning, from	11	1 A. I do.
12	resource planning to strategic planning, to	12	2 MR. MACDOUGALL:
13	issues around rates and rate setting and	13	3 Q. Mr. Chair, with that, again because all of the
14	revenue requirements. Generally, you know,	14	4 information has been prefiled, we do not
15	all the things that kind of get into the	15	5 propose to do an opening statement or take the
16	effectiveness of resource management,	16	6 gentlemen through their evidence. They are now
17	including I spent a couple of years on the	17	7 available for cross-examination.
18	Capital Budgeting Committee for the	18	8 CHAIRMAN:
19	transmission and distribution aspects of	19	9 Q. Over to you, Madam Greene.
20	Northeast Utilities, which at the time was a	20	0 CROSS-EXAMINATION BY GREENE, Q.C.:
21	three state, about a 6000 megawatt utility at	21	1 GREENE, Q.C.:
22	that time.	22	2 Q. Thank you, Mr. Chair. Good morning,
23	MR. MACDOUGALL:	23	3 gentlemen.
24	Q. Thank you very much, Mr. Athas. Mr. Chair,	24	4 MR. DIDOMENICO:
25	with that brief summary and with the more	25	5 A. Good morning.
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1	extensive resumes that have been prefiled, we	1	1 MR. ATHAS:
2	would ask that Mr. DiDomenico and Mr. Athas be	2	2 A. Good morning.
3	qualified to provide expert evidence in	3	3 GREENE, O.C.:
4	electric utility management planning and	4	4 O. As I will be talking about your report, I
5	operations.	5	5 wonder, Ms. Grav, if we could bring up La
6	CHAIRMAN:	6	6 Capra's August 7th report, which, of course,
7	O. Okay. So you have nothing further?	7	7 was Appendix "B" to Hydro's reply. Could you
8	MR. MACDOUGALL:	8	8 please tell us, and I'm not sure who would
9	O. We have no - because we filed both the reply	9	9 like to answer this question, when La Capra
10	and the surrebuttal. I will simply ask the two	10	was retained by Hydro for this proceeding, I
11	gentlemen if they could confirm that with	11	1 understand it was after Liberty filed its
12	respect to Appendix "B" of Hydro's reply	12	2 prudence review report on July 6th, is that
13	evidence of August 7th, and Appendix "B" of	13	3 correct?
14	Hydro's surrebuttal of October 14th, which are	14	4 MR. DIDOMENICO:
15	the two La Capra Reports, and with respect to	15	5 A. That's correct.
16	a few of the RFIs that were specifically	16	6 MR. ATHAS:
17	addressed to La Capra, were those provided	17	7 A. That's correct.
18	under your direction and control, gentlemen?	18	8 GREENE, Q.C.:
19	MR. DIDOMENICO:	19	9 Q. Can you please tell us the specific date that
20	A. They were.	20	you were retained by Hydro?
21	MR. ATHAS:	21	1 MR. ATHAS:
22	A. Yes, they were.	22	2 A. It was - I don't know the exact date. I'm
23	MR. MACDOUGALL:	23	3 sure it was the middle of July. It must have
24	Q. And are they true to the best of your	24	4 been about a week after the filing by Liberty.
25	knowledge and belief?	25	5 We had a very limited amount of time of about

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1 2 3 4 5 6 7 8 9	Page 1 two to three weeks, I think, from the time we started chatting to the time that there was a target date for filing. GREENE, Q.C.: Q. And at the time of your retention, could you please tell us what was the scope of your retention, that is what was it Hydro asked you to do? MR. ATHAS:	13 1 2 3 4 5 6 6 7 7 8 9	1 M 2 3 4 5 6 7 8 9	 R. DIDOMENICO: A. Fundamentally, we received relevant transcripts - not the but the record information th relative to the two incidents, We reviewed that material, o and we also set up conference with Hydro staff to review on of what they were sending us to make sure there were? 	Page 115 a copy of all the transcripts, nat was on file in particular. only that material, ce calls to meet ur interpretation s, and to go over	
	that had significant amounts of findings and	10	1	of how we were interpreting	things	
11 12 13 14 15 16 17	they told us they wanted us to address two particular findings; the issues around the black start, and the lube oil, and 9:26) wharf area, and they mentioned that they were - in their report, there was a question of whether the company was prudent, and they asked us if	12 13 14 15 16 17	2 GI 3 4 5 6 7	REENE, Q.C.: Q. I took from your answer tha you with selected documenta issues; black start at the Holy Unit 1 failure at the Holyrood correct?	t Hydro provided tion about the two rood plant and d plant, is that	
18	we would have some expertise in that matter,	18	8 M	R. DIDOMENICO:		
19	and whether we would be willing to look at it	19	9	A. To my knowledge, it was all	the information	
$ ^{20}_{21}$	as an independent look to see what we would	20	$\frac{1}{2}$	related to those two incidents	š.	
$ ^{21}$	think about the practices that went into	21	I GI	REENE, Q.C.:	formation with at	
$ ^{22}_{22}$	issues in question. We told them that we	22	2	Q. And when you say all the li	normation, what	
23	definitely had the expertise and our approach	25	э 4 м	P. DIDOMENICO:		
$\begin{vmatrix} 24 \\ 25 \end{vmatrix}$	as an independent is well documented in many	24	+ IVI. 5	A Information requests reports	things that had	
	Dage 1	14		n. mornation requests, reports	Dece 116	
1 2 3 4 5 6 7	of the other works that we do, and the fact is that we would - we told them, obviously, we had no idea at the time that we started discussions what we would agree with and what we would not about the practices that Hydro had taken place a few years ago. MR. DIDOMENICO:	14 1 2 3 4 5 6 7	1 2 3 4 GI 5 6 7 M	been filed relative to the ca binders that are sitting on a testament to the information.REENE, Q.C.:Q. Those two binders there, is documentation?R. DIDOMENICO:	it, that's the	
8	A. If I could add, our scope was essentially	8	8	A. That's a good portion of it.		
9 10 11 12	Hydro staff, in addition to reviewing the record of the events leading up to the January event.	9 10 11 12	9 GI 0 1 2	REENE, Q.C.: Q. Okay, and after you receive documentation from Hydro, set up conference calls with i	ed the written you mentioned you individuals?	
13	GREENE, Q.C.:	13	3 M	R. DIDOMENICO:		
14 15 16 17	 Q. And was this your first experience with the island interconnected electrical system in Newfoundland? MR. ATHAS: 	14 15 16 17	4 5 6 7 G]	A. It wasn't so much individua individuals, depending upon was. REENE, O.C.:	uls as teams of what the topic	
18	A. Mine, yes.	18	8	Q. Okay, and can you tell us y	who the team of	
19	MR. DIDOMENICO:	19	9	individuals were for the blac	k start matter?	
20	A. Yes.	20	0 M	R. DIDOMENICO:		
21	GREENE, Q.C.:	21	1	A. I'm not sure I can give you th	he exact record,	
22	Q. And how did you go about doing the work after	22	2	if you will, of exactly who w	vas on the call.	
23	you were retained? You mentioned you had a	23	3	I know Mr. Henderson was p	part of the calls for	
24 25	short period of time in which to do it, so can you tell us how you went about doing it?	24 25	4 5	the most part, but I don't kno that was on the calls.	w the whole team	

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1	GREENE, Q.C.:	1		between the need for additional capacity on	
2	Q. Okay, and what about the team for Unit 1?	2	<u>.</u>	the island and how it related to the	
3	MR. DIDOMENICO:	3	3	requirement for black start at Holyrood?	
4	A. The same situation, I don't have that readily	4	MR	R. DIDOMENICO:	
5	available.	5	; A	A. At this point I'm more familiar with it than I	
6	GREENE, Q.C.:	6	5	was at the time this report was written	
7	Q. Mr. Henderson was on both teams, is that how I	7	/	because I've reviewed the transcripts.	
8	understood your answer?	8	GRJ	EENE, Q.C.:	
9	MR. DIDOMENICO:	9) (Q. Okay. I'd like first to go to page 13 of 39	
10	A. That's my understanding.	10)	of your report. If we could go back to	
11	GREENE, Q.C.:	11		Section 2.3, "Review and Conclusions", and in	
12	Q. How many conference calls did you have with	12	2	the first sentence there, "Hydro's principal	
13	the Hydro personnel?	13	5	shortcoming regarding its decision on black	
14	MR. DIDOMENICO:	14	ł	start is at most not doing more to keep the	
15	A. I'm estimating now, again I don't know the	15	ś	Board informed of its decision making process,	
16	precise number, but I believe we probably had	16	5	and its ultimate decision to accept the loss	
17	either four or five calls.	17	/	of on-site black start on an interim basis	
18	MR. ATHAS:	18	3	until a new CT could be placed in service at	
19	A. That's my recollection.	19)	Holyrood as the permanent solution". I wanted	
20	GREENE, Q.C.:	20)	to talk to you first about this issue of	
21	Q. Did you visit Newfoundland prior to your	21		communications. I take from your report that	
22	coming here for evidence - to give evidence?	22	1	you do agree that there was a lack of	
23	MR. DIDOMENICO:	23	<i>;</i>	communication between Hydro and the	
24	A. I did not.	24	ŀ	stakeholders with respect to the status of	
25	GREENE, Q.C.:	25	į	black start at the Holyrood plant, is that	
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1	Q. At the time you were provided with the	1	L	correct?	
2	information, you mentioned that you were given	2	2 MR	R. DIDOMENICO:	
3	the information related to the two specific	3	; A	A. With respect to this specific element, yes.	
4	issues you had been asked to look at; black	4	GRI	EENE, Q.C.:	
5	start and Unit 1. Do I take from that, that	5	; (Q. In your opinion, what would have been more	
6	you weren't given any documentation or	6	j	appropriate timely communication?	
7	information with respect to other issues	7	MR	L. DIDOMENICO:	
8	before the Board, such as the new 100 megawatt	8	; A	A. I think based on the information that we	
9	CT?	9)	reviewed, it was obvious that this was an	
10	MR. DIDOMENICO:	10)	issue that was kind of paramount in the	
11	A. It's generally correct. I want to qualify the	11		public's eye, so to speak, so people were very	
12	answer a little bit in the sense that in the	12	*	well aware of it, there had been communication	
13	documentation that we had, there were	13	i .	about black start issues. I guess, from my	
14	certainly references to that 100 megawatt CT,	14	•	perspective, it would have followed that once	
15	but in terms of any specific record related	15	i -	an ultimate decision was made, it would have	
16	exclusively to that CI, I don't think we have	16	, -	been a good idea to run that by the Board	
17	all that information.	17		rather than wait for them to find out about it	
18	OREENE, Q.C.:	18			
19	Q. were you familiar at the time of your review	19	GRI	LEENE, Q.C.:	
$\begin{bmatrix} 20\\ 21 \end{bmatrix}$	nlane for the island interconnected system?	20	, (the events that happened I noticed that you	
$\begin{vmatrix} 21 \\ 22 \end{vmatrix}$	plans for the island interconnected system?	$\begin{vmatrix} 21\\ 22 \end{vmatrix}$,	did record that Hydro, advised the Board in	
$\begin{vmatrix} 22\\ 22 \end{vmatrix}$	Δ I was not	22	, K	February of 2011 that the stop work order had	
$\begin{vmatrix} 2 \\ 2 \\ 2 \\ 4 \end{vmatrix}$	GREENE OC	$\begin{vmatrix} 23 \\ 24 \end{vmatrix}$	L	been lifted is that correct?	
25	Q. So you're not familiar with the connection	25	5 MR	R. DIDOMENICO:	

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1	A. That's correct.		1	1	made the decision to tolerate the risk
2	GREENE, Q.C.:		2	2	associated with not having black start
3	Q. And the next communication noted from Hydro to		3	3	capability at Holyrood on an interim basis
4	the Board with respect to the status of black		4	4	until a permanent long term solution could be
5	start at the Holyrood plant was not until		5	5	implemented, thereby relying solely on the
6	August of 2013, which was in response to a		6	6	Hardwoods gas turbine or Hardwoods to black
7	request from the Board following the January		7	7	start the Avalon Peninsula in the event it
8	2013 outages, is that correct?		8	8	became separated from the rest of the system".
9	MR. DIDOMENICO:		9	9	So the first thing I wanted to ask you about
10	A. That's my understanding.		10	0	is one of the principal basis for your opinion
11	GREENE, Q.C.:		11	1	is that the use of the Hardwoods gas turbine
12	Q. Now your view with respect to communications,		12	2	was only to be an interim option or an interim
13	would you agree that it's the same as what		13	3	solution, is that correct?
14	Liberty expressed in its report?		14	4 MR.	DIDOMENICO:
15	MR. DIDOMENICO:		15	5 A.	Interim in the sense that at this time it
16	A. I would say substantially, yes.		16	б	would have been the only solution as opposed
17	GREENE, Q.C.:		17	7	to the fact that it's always been part of the
18	Q. So there's no dispute between you and Liberty		18	8	solution.
19	that there was improper or inadequate		19	9 GRE	ENE, Q.C.:
20	communication?		20	0 Q.	But if we go back, first of all, you would
21	MR. DIDOMENICO:		21	1	agree that Hydro's planning had always been to
22	A. Communications could have been better.		22	2	have on site black start capability at the
23	GREENE, Q.C.:		23	3	Holyrood plant, is that correct?
24	Q. And I take it, you would also agree that		24	4 MR. 1	DIDOMENICO:
25	Liberty did not use the inappropriate or the		25	5 A.	Certainly.
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1	lack of communication as one of the factors		1	1 11:4	5 a.m.)
2	contributing to its imprudence finding, is		2	2 MR.	ATHAS:
3	that correct?		3	3 A.	Just to add to that, I mean, our understanding
4	MR. DIDOMENICO:		4	4	is that Hydro's planning for black start, you
5	A. I believe that's correct.		5	5	know, first centres around black start from
6	GREENE, Q.C.:		6	б	power from the grid, and I just wanted to
7	Q. The next thing, if we go back to your review		7	7	clarify that the reliance on Hardwoods is not
8	and your conclusions, starting on page 14, and		8	8	the first step, and most of the time that
9	I want to take you to the top of page 14, and		9	9	there's been a black start, there's been power
10	I believe it's the last sentence in the		10	0	available from the grid, was our
11	paragraph that carried over from the previous		11	1	understanding, and deployed to black start the
12	page, and you'll see that we're going to spend		12	2	Holyrood facility.
13	some time around this one sentence because it		13	3 GRE	ENE, Q.C.:
14	seems to summarize your opinion. If you could	l l	14	4 Q.	I'm not sure what your answer actually meant
15	scroll down, Ms. Gray, to page 14 of 39, the		15	5	in the context of my question. The evidence
16	end of the first paragraph, the paragraph that		16	5	to date on the record is that Hydro's plan and
17	carried over. I'm sorry, you were on the		17	7	its preferred solution, even when it found
18	previous page. I'm looking at the top of page		18	8	itself in the situation in January, 2012, is
19	14 of 39. I'd like to read a quote from the		19	9	that because Holyrood was critical, that black
20	last sentence in the paragraph at the top of		20	0	start at the Holyrood plant was their
21	the page that carried over from the previous		21	1	preterred position. Do you agree with what I
22	page, and as I said, I believe this sentence		22	2	just said was Hydro's position?
23	seems to summarize your opinion with respec	t	23	3 MR.	DIDOMENICO:
24	to black start. You're saying, "What is not		24	4 A.	. 1 do.
25	debatable is that Hydro management conscious	sly	25	5 MR.	ATHAS:

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1	A. Yes.		1 GI	REENE, Q.C.:
2	GREENE, Q.C.:		2	Q. Okay, why is it normal for utilities in
3	Q. Okay, so it was because they found themselves	s,	3	planning the system to provide for black start
4	as I understand your opinion, in 2012 that		4	for the Holyrood plant? Let's use Holyrood as
5	they could not use the on site gas turbine		5	an example.
6	after receipt of the AMEC Report, so they		6 M	R. DIDOMENICO:
7	couldn't rely on what they had used in their		7	A. Like, I don't want to speak to Holyrood
8	planning since the plant went in operation.		8	exclusively because, in general, the purpose
9	The plan had always been to have an on site CT		9	of black start is to facilitate restoring the
10	at Holyrood, and now, in fact, when we came t	o	10	system when the major supply is interrupted.
11	use of Hardwoods, it was only an interim step.		11 GI	REENE, Q.C.:
12	They were still going to go back and put black		12	Q. And the idea of doing black start is to be
13	start at the Holyrood plant.		13	able to start the plant when there is no
14	MR. DIDOMENICO:		14	supply available from the grid, isn't that why
15	A. I think some context is necessary, if I may.		15	it's called a black start?
16	GREENE, Q.C.:		16 M	R. DIDOMENICO:
17	Q. Sure.		17	A. For the plant, yes.
18	MR. DIDOMENICO:		18 GI	REENE, Q.C.:
19	A. The issue here seems to be muddled between		19	Q. Okay.
20	black start, area restoration. We go back and		20 M	R. DIDOMENICO:
21	forth between what we're talking about here.		21	A. But be aware that black starting the plant, in
22	The black start of the Holyrood plant is a		22	and of itself, is not an end. In order to
23	portion of the plant providing energy to the		23	restore power to the customers, you have to
24	Avalon Peninsula. It's only a portion of it,		24	have generation, you have to have
25	it's not the plan, it's a part of the plan. So		25	transmission, you have to have distribution.
	Page	126		Page 128
1	we're talking about an element of the plan		1	All of that has to work before the lights come
2	when we say this. So in addition, as John was		2	on.
3	pointing out a minute ago, when the worst		3 GI	REENE, Q.C.:
4	occurs, if Holyrood trips offline, the first		4	Q. Oh, yes.
5	recourse is to restart the unit based on power		5 M	R. DIDOMENICO:
6	from the grid. If that is not there, then it		6	A. That's all I'm trying to clarify.
7	would go to Hardwoods.		7 GI	REENE, Q.C.:
8	GREENE, Q.C.:		8	Q. And in Hydro's situation, which is what the
9	Q. It would go to where?		9	issue the Commissioners have to deal with, in
10	MR. DIDOMENICO:		10	looking at the Holyrood plant from the time
11	A. It would go to Hardwoods as secondary -		11	the plant went in, Hydro's planning had been
12	GREENE, Q.C.:		12	to have on site black start capability at the
13	Q. If there's no power from the grid, it goes to		13	Holyrood plant.
14	Hardwoods?		14 M	R. DIDOMENICO:
15	MR. DIDOMENICO:		15	A. Correct.
16	A. If there's no power from the grid to restart		16 GI	REENE, Q.C.:
17	Holyrood, it would use Hardwoods to do that.		17	Q. And, in fact, even in 2012 when Hardwoods
18	MR. ATHAS:		18	became an option, it had always been Hydro's
19	A. And from there, we mean off peninsula power.		19	plan to return to have black start capability
20	GREENE, Q.C.:		20	at the Holyrood site, is that correct?
21	Q. So let's talk about black start capability		21 M	R. DIDOMENICO:
22	then. Black start capability for the Holyrood		22	A. That is correct, with just one amplification,
23	plant.		23	Hardwoods was always part of the area
24	MR. DIDOMENICO:		24	restoration plan.
25	A. Holyrood plant.		25 GI	REENE, Q.C.:

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	Pa	ge 129				Page 131
1	O. Now why do we need black start capability a	at	1		start plan for Holyrood would prim	arily rely
2	the Holyrood plant, what additional benefit		2	2	on energy available from the grid su	ipplied by
3	does it give us over having it available from		3	;	Hardwoods if it became electrically	isolated
4	Hardwoods?		4	ļ	from the remainder of the system",	, and you
5	MR. DIDOMENICO:		5	í	just helped explain a little bit of wh	at you
6	A. In general, the more sources of supply - the		6	j	were talking about there. When yo	u go up to
7	more sources of supply that can be started		7	1	your first line, you say at the very	first
8	with black start the better, so whether we		8	5	paragraph, "Here is one of various	examples
9	have two, three, four, five, the more the		9)	where Liberty implies that Hydro di	d not have
10	better. That's essentially the benefit of it.		10)	a black start plan. Hydro had a blac	ck start
11	GREENE, Q.C.:		11		plan for the Avalon Peninsula", and	d I just
12	Q. So one benefit of having the black start at		12	2	wanted to confirm, as I thought we	just did,
13	Holyrood was to be able to keep units warm,	is	13	5	that that plan for use of Hardwoods	did not
14	that correct?		14		provide the same level of additional	backup as
15	MR. DIDOMENICO:		15	j	Hydro's previous plan up to 2012.	. So it
16	A. Absolutely.		16	j	wasn't the same black start backup	plan, is
17	GREENE, Q.C.:		17	,	that correct?	1
18	Q. Even if there was no source of power from the	ie	18	MR	. DIDOMENICO:	
19	grid?		19) .	A. It was not the same plan, but we're	talking
20	MR. DIDOMENICO:		20)	matters of degree, but it was not th	ne same
21	A. Absolutely.		21		plan.	
22	GREENE, Q.C.:		22	GR	EENE, Q.C.:	
23	Q. Okay, and for the Holyrood plant for the		23	; (Q. Okay. So you're saying that Hydro	o did have
24	Newfoundland electrical system, that up until	1	24		black start capability, and that black	k start
25	2012 that had been Hydro's plan, is that		25	í	capability was only as long as they of	could get
	Pa	ge 130			· · · · · ·	Page 132
1	correct? They would have black start at	50 150	1		power over the grid to the Holyrood	nlant and
$\begin{vmatrix} 1 \\ 2 \end{vmatrix}$	Holyrood to keep the units warm even in the	-	2)	that's what we see with the Hardwo	ods option?
	event all of the lines were down they would	0	3	MR	DIDOMENICO:	ous option.
4	be able to have the plant up and running as		4		A I'm not sure I - would you please re	peat that?
5	soon as the lines were connected?		5	GR	FENE OC:	pour mur.
6	MR. DIDOMENICO:		6	i I). You're saving that they could use]	Hardwoods
7	A True enough		7	,	and get power from the grid and yo	u're saving
	GREENE, O.C.:		8	5	that that is Hydro's black start plan?)
9	0. So when I come back to your sentence, the fa	nct	9) MR	DIDOMENICO:	
10	that in 2012. Hardwoods became available		10)	A. For the peninsula, yes.	
11	while it didn't provide the same level of	,	11	GR	EENE O.C.:	
12	reliability or backup, whatever word we agree	e	12). Right, and I'm saving that that plan	was only
13	upon, had existed previously when they had	1	13		as good as the ability to get power	in from
14	black start at Holyrood and the Hardwoods	5	14	-	Hardwoods into the plant, which v	ou've just
15	option, would you agree with that?		15	i	agreed with me?	J
16	MR. DIDOMENICO:		16) MR	. DIDOMENICO:	
17	A. I would, again as an interim solution.		17		A. Agree.	
18	GREENE, O.C.:		18	GR	EENE, O.C.:	
19	Q. Now I'd like to go to your surrebuttal of		19) 1	Q. And, therefore, that black start plan	was not
20	October 14th, page 4 of 9. Hvdro's		20)	the same as, and, in fact. I would u	use the
21	surrebuttal, which in your report is attached		21		words "not as good as" the previous	plan. Now
22	again as Appendix "B", I believe, and page 4		22	2	you can take exception to "not as g	good as",
23	Looking at this, your first sentence in the		23	;	but not as reliable -	, - 2
24	very first paragraph on page 18. "La Capra		24	MP	. DIDOMENICO:	
25	Associates understanding is that the black		25		A. And I would take exception to that,	but again,

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	Page 13	3		Page 135
1	as I think we've said more than once. Hydro	1	1 M	IR. DIDOMENICO:
2	made the conscious decision to accept a lower	2	2	A. Yes.
3	level of reliability on an interim basis until	3	3 G	REENE, O.C.:
4	they could produce the other new CT.	4	4	0. And we're going to come back to that as well.
5	GREENE, O.C.:	5	5	Now the next thing and you just brought me
6	0. So vou're -	6	6	there, was the fact that it was, "What is not
7	MR_DIDOMENICO:	7	7	debatable is that Hydro management consciously
8	A Specifically around all the issues that go	8	8	made the decision to tolerate the risk". So
9	into that decision - recall again. I'm just	G	9	when we look at that. I wanted to know the
10	trying to amplify here a little bit that when	10	0	basis for your statement that management
11	vou're making a decision like this, vou're not	11	1	consciously made the decision to tolerate a
12	looking at this in a vacuum. You're not	12	2	risk. First, what did you rely on to come to
13	looking at it from a reliability only	13	3	your conclusion that it was a conscious
14	perspective. You're looking at the	14	4	decision?
15	reliability benefit, you're looking at the	15	5 M	IR. DIDOMENICO:
16	cost, and you're looking at the probability of	16	6	A. It was a combination. It was a combination of
17	that benefit actually accruing to the	17	7	the information that we read that was
18	customers that are paying for this.	18	8	available via information requests, what have
19	GREENE, Q.C.:	19	9	you, and the interviews that we had with the
20	Q. Okay.	20	.0	Hydro team, the conference calls that I
21	MR. DIDOMENICO:	21	1	alluded to earlier.
22	A. Of those three elements, only one is certain	22	2 G	REENE, Q.C.:
23	and that's the cost you're going to incur.	23	3	Q. And you can't recall who you had those
24	Whether or not that reliability benefit ever	24	4	conference calls with other than Mr.
25	actually accrues, it may, it may not. In this	25	5	Henderson?
	Page 13	4		Page 136
1	specific instance, we're dealing with an issue	1	1 M	IR. DIDOMENICO:
2	that had extremely low level of likelihood of	2	2	A. Certainly Mr. Henderson was part of it. I do
3	occurring, and they made the call to accept	3	3	not remember the whole staff, but it would
4	some risk on an interim period until they	4	4	have been anyone that was directly related to
5	could get the permanent long term solution. I	5	5	those two issues, and we can go back and get
6	mean, I think that embodies everything that	6	6	you that information.
7	we're saying.	7	7 G	REENE, Q.C.:
8	GREENE, Q.C.:	8	8	Q. Do you know if you talked to the people who
9	Q. And we're going to come to each one of these	9	9	are involved in making the decision at the
10	step by step. The first one I was talking	10	0	time back in 2012, and we've heard evidence
11	about was the fact that it was interim and	11	1	that it was a Mr. Haynes was the Vice
12	that you're saying that they did have a black	12	2	President who was primarily responsible?
13	start plan, and I think you've agreed with me	13	3 M	IR. DIDOMENICO:
14	that that black start plan they had after they	14	4	A. I don't know.
15	were only relying on Hardwoods wasn't - did	15	5 G	REENE, Q.C.:
16	not provide the same level of reliability or	16	6	Q. So this is talking to individuals after the
17	backup as the previous plan?	17	7	event. Did you see any analysis that Hydro
18	MR. DIDOMENICO:	18	8	had done at the time, not when you were
19	A. Agree.	19	9	talking to them in 2015, did Hydro provide you
20	GREENE, Q.C.:	20	0	with any internal reports or analysis with
21	Q. Okay. Now if we could go back to your report	21	1	respect to the factors they considered in
22	where we were just talking about the - here we	22	2	making the decision?
23	go, your last sentence. We talked about one	23	3 M	IR. DIDOMENICO:
24	of the important factors in your opinion is	24	4	A. If you're referring to a specific document or
25	that it was an interim decision?	25	5	report, the answer to that would be "no".

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 GREENE, Q.C.: Q. And you are aware that Hydro wa provide a copy of any documentation analysis, reports, memos, and non Hydro was not able to provide any? MR. DIDOMENICO: A. That's my understanding as well. 8 GREENE, Q.C.: Q. So again you relied upon your reviol evidence that we've all seen, and di in 2015 with individuals, some of w maxing process back in 2012, is tha MR. DIDOMENICO: A. That is correct. 	Page 137 1 s asked to n, including e were - 4 ew of the scussions 2 6 7 8 ew of the 9 scussions 10 2 11 10 10 10 10 10 10 10 10 10	January 11, 2013, e scenario had occurred MR. DIDOMENICO: A. That's correct. GREENE, Q.C.: Q. And I wondered wha statement? MR. DIDOMENICO: A. It was based on inform Hydro. (12:00 p.m.) GREENE, Q.C.: Q. Can you point to an information that you that it was three times	Page 139 vent, a black start I only three times". It was the basis for that mation we received from my specific piece of relied on for the fact s before?	
 16 GREENE, Q.C.: 17 Q. Now the next part of this, as I said, 18 sentence that really summarizes yo 19 so we will spend some time on it. 20 they made the decision to tolerate t 21 What risk was it they made the de 22 tolerate? 23 MR. DIDOMENICO: 24 A. The lack of on site black start capat 25 Holyrood. 	is one 16 ur opinion 18 You said 19 he risk. 20 cision to 21 22 23 pility at 24	 6 MR. DIDOMENICO: 7 A. That was based on co with the Hydro staff. 9 GREENE, Q.C.: 0 Q. The response to PR-PU it was two times, incl PUB-NLH-003, if you 3 Anyway, nothing turr 4 - so it was based on o 5 given in your confere 	JB-NLH-003 indicates that uding 2013. We can go to like, Attachment 1. as on it. I just wondered ral information you were nce calls?	
 1 GREENE, Q.C.: Q. Okay, and in your mind, what quantification of that risk? 4 MR. DIDOMENICO: A. I think the quantification would depending upon circumstances. particular instance that we're talking we go back to that 11 hours that w discussing over and over again, th warming time, if you will, the abilit the units warm while the rest of the was unavailable. I GREENE, Q.C.: Q. So that was one risk, they lost the warming. You also mentioned in h the other factors that I thought rela their assessment of the risk was the 	Page 1381is the234vary5In theg about,7e've been8ne pre-9y to keep10e system111213use of1415ited to161617	 MR. DIDOMENICO: A. Yes, and again I'm go myself, forgive me, but about what we're catego That term is thrown are thrown around in differ want to make sure that same manner. When w start there, we were tall that the system was isol GREENE, Q.C.: Q. Yes. MR. DIDOMENICO: A. As opposed to - GREENE, Q.C.: Q. And when you say isola MR. DIDOMENICO: 	rage 140 ing to keep repeating we need to be careful orizing as black start. ound a lot, and it's rent contexts, and I we're using it in the e were talking about black king about the fact ated.	
 18 exposure, given the limited number 19 that it happened before, is that correct 20 MR. DIDOMENICO: 21 A. That's correct. 22 GREENE, Q.C.: 23 Q. And if we go down to the next para 24 say in the second sentence, "It is 25 understanding that since 1990 and 	of times 18 ct? 19 20 21 22 agraph, you 23 s our 24 prior to 25	 A. Electrically isolated. GREENE, Q.C.: Q. Are you talking about th are you talking about th MR. DIDOMENICO: A. I'm talking about the A GREENE, Q.C.: Q. Okay so the risk of no 	the Holyrood plant or e Avalon Peninsula? valon Peninsula.	

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	1 start at the Holyrood plant. I think that y	vou 1	to spend money, right. The easiest thing any	
	2 have agreed that one thing that was los	t by 2	engineering staff can do is buy a new one, buy	
	3 not having it is the ability to keep the ur	uits 3	a new power plant buy a new transmission	
	4 warm so that they would be ready to ge	o when 4	sure why not let me go buy it. If that's	
	5 power is connected?		the only concern if you're only concerned	
	6 MR DIDOMENICO:	5	about reliability and not balancing	
	7 A Certainly	7	reliability and cost which is the job of	
	8 CREENE OC:	2	every utility manager that's the dilemma	
	$0 \qquad 0 0$	ect to 0	that was the question that's what they were	
	³ Q. Okay, and in your discussion with resp the low risk that the avent would occur	tho 10	faced with that's what they were trying to	
	10 fact that it didn't happen very often I'	m 11	instify	
	11 fact that it that in the context of your		JUSHIY.	
	12 If ying to put that in the context of - yo	u 12 ith 12	O And of course there's also legislative	
	15 are also, as 1 understand it, agreeing while 14 the Hydro position that it is better to be	101 15 NO 14	Q. And of course, mere's also registative	
	heads stort at Holyrood and that is the	ve 14	agest newer So I take it from even that	
	15 Diack start at Holylood and that is the	ll 15	cost power. So I take it from even that	
	16 preferred option, and that's what they	11au 16	the rich was low the fact that it could	
	17 always intended to do.	17	the fisk was low, the fact that it could	
	18 MR. DIDOMENICO:	18	would community often that is not a basis	
	A. Fes, off a long term basis, yes.	19	for accurate that black start at the Halvand	
	20 GREENE, Q.C.:	20	for saying that black start at the Holyrood	
	21 Q. So the fact that it might be a fare event	Or 21	she was not a good decision by Hydro at the	
	22 only happened a few times, so the fisk	was 22	time it made the decision and in fact, it	
	23 low, and that is one of the factors you	lse 23	it may a superstant it may a superstant and	
	24 I of saying it was a low fisk. Isn't that w	nat 24	it was a rare event, it was prudent and	
	25 utilities are supposed to do when they	16 25	essential as part of the fenable Island	
		Page 142	Page 144	
	1 planning? We don't say it hasn't happ	pened 1	Interconnected system to have black start at	
	2 very often, so don't worry about it. I v	vas 2	the Holyrood plant?	
	3 confused by - you seem to rely so much	on the 3	MR. DIDOMENICO:	
	4 fact that it was rare.	4	A. It is beneficial, yes. But again, remember	
	5 MR. DIDOMENICO:	5	the context.	
	6 A. Well, I think when we're looking at m	aking 6	GREENE, Q.C.:	
	7 investments, millions of dollars worth	of 7	Q. Oh yeah.	
	8 investments, large investments in assets	s, we 8	MR. DIDOMENICO:	
	9 don't do that on a whim relative to some	stning 9	A. The longer we go, the longer the period of	
	10 that may occur some time that hash t oc	curred 10	time, the more likely the event is to occur.	
	11 or has happened very infrequently.	Ine II	Short term, very unlikely. we go 10 years, 20	
	12 exposure period here was, as we were	just 12	years, 50 years, it's more likely. It's in	
	13 taiking about, three times in the last 2	5 13	chernie o c	
	14 years. Now we re exposed for anothe	r two 14	GREENE, Q.C.:	
	15 years of two and a nall years of whatev	er it 15	Q. Okay.	
	16 was. The likelihood of that event occurr	Ing In 16	MK. AIHAS:	
	17 that time frame is very, very low, I me	all, 1/	A. And I d like to just add one thing too. Our	
	18 very, very low. we le taiking less that	ll a 18	and as we mentioned on page five of pine on	
	19 percent type of a low. So again cost ben	ent. 19	and as we mentioned on page five of fine of	
	20 UKEENE, Q.C.:	$\begin{vmatrix} 20\\ 21 \end{vmatrix}$	surreputtal was that the a limited decrease	
	21 Q. OKAY.		in reliability was consciously known, by the	
	22 IVIN. DIDOMENICO.	ause it $\begin{vmatrix} 22\\ 22 \end{vmatrix}$	management at Hydro, the people making that	
	24 strikes me when I go through the testing	$\begin{array}{c c} 1 & 25 \\ 1 & 24 \\ 1 &$	decision not the specific issue of an 11 hour	
	25 here the easiest solution for any utility		outage for the warming and the like	
	i zo i nere, me cubiedi borutton for any utility i		satuge for the warning and the like.	
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Pa	age 145			Page 147
1 Predominantly on their experience that most	of 1	1 M	R. DIDOMENICO:	C C
2 the that the black start incidences have	2	2	A. Within reason, yes.	
3 been from the grid and from and very shor	rt 3	3 GI	REENE, Q.C.:	
4 durations. So that that level of reliability,	4	4	Q. Okay. And coming back ag	ain to that one last
5 some reliability degradation was what was	s 5	5	to this sentence on the to	p of page 14,
6 traded off in the issue of cost and exposure	6	6	that Hydro's reliance on an	alternate, which
7 for the interim period, not a specific event.	7	7	was the Hardwoods gas turk	oine, which you've
8 That specific event was of an additional 11	8	8	acknowledged didn't provid	e the same level of
9 hours, as unfortunate as it was, is an outcom	e 9	9	black start capability for the	plant, in that
10 of the and not a specific input to the	10	0	situation, in your opinion,	the how
11 decision process.	11	1	important is the functiona	ality or the
12 GREENE, Q.C.:	12	2	alternative that was being p	proposed if you
13 Q. But the fact that the units would not be able	13	3	look at how important a fact	or was it whether
14 to quickly generate power, the warming thin	g, 14	4	the alternative being propo	sed was a good
15 that was a foreseeable thing, not just an	15	5	option?	
16 outcome I assume?	16	6 M	R. DIDOMENICO:	
17 MR. ATHAS:	17	7	A. You're going to have to help	o me again because
18 A. It was foreseeable in the context of having a	18	8	I'm not sure I understand.	
19 if you could foresee a weather event that	19	9 GI	REENE, Q.C.:	
20 would take all five lines down to the facility	20	0	Q. Hydro was looking at the	Hardwoods gas
21 at Holyrood.	21	1	turbine.	
22 GREENE, Q.C.:	22	2 M	R. DIDOMENICO:	
23 Q. Which of course is, as we said even though	n 23	3	A. Yes.	
24 it's rare, is what Hydro had been planning or	n. 24	4 GI	REENE, Q.C.:	
25 It's why they have black start at the plant to	25	5	Q. In your opinion, in making t	hat looking at
Pa	ige 146			Page 148
1 begin with. So if we come back to your last	t 1	1	that, was it a factor that wh	hat they were
2 sentence, we've talked about some of the	2	2	going to rely on was going t	o work?
3 factors. We've talked about the conscious	3	3 M	R. DIDOMENICO:	
4 decision and we've talked about what the ris	^k 4	4	A. Yes.	
5 was for the tolerance. Part of it, as Mr.	5	5 M	R. ATHAS:	
6 DiDomenico just said in one of his previou	s 6	6	A. May I add again, Hardwoo	ds has always been
7 answers, was the length of time. Do you kno	ow 7	7	part of the restoration plan	for the Avalon
8 what Hydro was anticipating in 2012 as the	e 8	8	Peninsula. It's never not	been. The
9 period that this interim solution would be in	9	9	difference is that it was bein	g solely relied
10 effect?	10	0	upon, just to clarify.	
11 MR. DIDOMENICO:		I GI	REENE, Q.C.:	d mail
12 A. It was my understanding that by early 15	12	2	Q. And I guess T accept that an	a we il go back
13 there would be a more permanent solution f	In 13	3	again that the black start ca	padinty at the
14 place.	14	4 5 M		lent?
15 OREENE, Q.C.:	15	эм с	R. DIDOMENICO:	
16 Q. And in your opinion, that three-year period	. 10		A. Agreeu.	
17 was acceptable:	17	/ UI 0	And in fact if you go to the	a black start
10 MK. DIDOMENICO.	10	0 0	definition of being able to	black start
17 A. ICS.	20	2 0	without power from the grid	vou need a CT at
20 OREENE, Q.C.,	20	1	the Holyrood plant to be abl	e to achieve that
22 incumbent on Hydro to do everything possil	hle $\begin{vmatrix} 21 \\ 22 \end{vmatrix}$	1 2	Is that correct?	e to define ve that.
23 to ensure that that period of time that that _	22	~ ЗМ	R DIDOMENICO	
24 - the higher risk that we've just acknowledge	ed $\begin{bmatrix} 23\\ 24 \end{bmatrix}$	4	A. That's correct	
25 existed?	25	5 GI	REENE, Q.C.:	

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	Pa	ge 149			Page 151
1	O. So now we're looking at where Hydro was	in	1	1 A. Yes.	C
2	2012 and you're saying that they relied on		2	2 GREENE, Q.C.:	
3	Hardwoods and my question was, in looking	at	3	3 O. Okay.	
4	and seeing whether Hydro was a suitable bac	kup	4	4 MR. DIDOMENICO:	
5	plan, how important, in your opinion, was the	e	5	5 A. I think the answer was yes to that qu	estion.
6	ability of Hardwoods to actually function wh	en	6	6 MR. ATHAS:	
7	called upon?		7	7 A. Yeah, that 26 percent is not necessar	rily the
8	MR. DIDOMENICO:		8	8 time when there was unavailability of	of one of
9	A. Certainly was important.		9	9 the units to be able to provide black	s start
10	GREENE, Q.C.:		10	0 capability from Hardwoods.	
11	Q. Okay. If you can go to Liberty's report of		11	1 GREENE, Q.C.:	
12	July 6th at page 44, page 54, and if you		12	2 Q. So you have no difficulty with H	Iydro's
13	scroll down. And here if you look at the		13	3 experience with that Hardwoods gas	turbine in
14	third bullet where Liberty states "Hardwood	s	14	4 giving your opinion that that was a r	reliable
15	is particularly unreliable and hence		15	5 unit that could be relied upon for blac	ck start
16	inappropriate for a source of black start		16	6 capability?	
17	capability. It did not exhibit the high		17	7 MR. DIDOMENICO:	
18	probability of starting that a black start		18	8 A. In the context of the fact that they	were
19	resource requires. Utilization forced outage		19	9 investing significant effort into imp	roving
20	probability, UFOP, measures the probability		20	0 the reliability of that unit over that s	same
21	that a generator will not be available when		21	timeframe. I mean, there are life ext	tension
22	required. Hardwoods UFOP average over 2	6	22	2 efforts that were ongoing. The expe	ectation
23	percent from 2008 to 2012" and of course that	it 🛛	23	3 was that the availability would impro	ove. But
24	means it's not available about 25 percent of		24	4 again, that 26 percent is not indicati	ive of
25	the time when it was needed?		25	5 how much of that unit is actually av	vailable
	Pa	ge 150			Page 152
1	MR. DIDOMENICO:		1	1 for black start. It's a number less	than
2	A. Agreed.		2	2 that. I don't have the exact number.	
3	GREENE, Q.C.:		3	3 GREENE, Q.C.:	
4	Q. So would you with that information, whic	h	4	4 Q. So again, even with the record for Ha	ardwoods,
5	is on the record, would you have felt that		5	5 it doesn't give you any pause for c	concern
6	Hydro that Hardwoods was a reliable optic	n	6	6 about why Hardwoods would be an	acceptable
7	to be able to be used?		7	7 interim solution?	
8	MR. DIDOMENICO:		8	8 MR. DIDOMENICO:	
9	A. A reasonable option for it to be used?		9	9 A. Not given the fact that they had a p	olan in
10	GREENE, Q.C.:		10	0 place to improve the reliability of	that
11	Q. Yes.		11	1 facility.	
12	MR. DIDOMENICO:		12	2 GREENE, Q.C.:	
13	A. The answer would be yes.		13	3 Q. And would it give you any pause for	concern to
14	GREENE, Q.C.:		14	4 know that even though investment w	vas spent, we
15	Q. And is that because it was the only one they		15	5 still don't see a significant improven	ment in
16	had at that point?		16	6 the reliability of Hardwoods?	
17	MR. DIDOMENICO:		17	7 MR. DIDOMENICO:	
18	A. Well, the only one is one thing. But that		18	8 A. That's a concern.	
19	statistic talks speaks to the entire unit's		19	9 GREENE, Q.C.:	
20	availability. In order to be used and useful		20	0 Q. So if we go back again to that one s	sentence
21	as a black start unit, only half of the unit		21	1 which August 7th, Appendix B, pa	ge 14
22	needs to be available.		22	2 actually, I'm sorry, it's not that sente	ence.
23	GREENE, Q.C.:		23	3 It's you refer later on the page that it	t was
24	Q. And is that what you interpret that to mean?		24	4 to minimize cost. The second full pa	aragraph
25	MR. DIDOMENICO:		25	5 actually. Yes, "Hydro's managemen	t revisited

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1	the issue on a number of occasions and in each	ach	1	GREEN	E, Q.C.:
2	case decisions were made taking account	of	2	0. Sc	it's not just the utility who has input
3	minimizing the cost to its customers." And	1	3	in	to customers, of course, also are
4	here you're emphasizing, as you have earlie	er	4	сс	oncerned, aren't they, in terms of they want
5	in your testimony, that it was the least cost		5	th	eir lights on at a reasonable cost?
6	and we've talked a little bit about how you		6	MR. DII	DOMENICO:
7	balance reliability and how you balance cos	st	7	A. C	ertainly.
8	because there's no blank cheque book for a	nv	8	GREEN	E. O.C.:
9	utility. And in your view, how do, in this	J	9	0. A	nd that's the tension you always see. Now
10	particular circumstances, the importance o	f	10	th	e black start diesels went into service in
11	reliability for black start at the Holyrood		11	A	pril of 2014 and at that time, the plan was
12	plant, what weight should have been given	to	12	th	at they would remain in service until mid
13	that reliability versus the cost?		13	20	15. so just a little over a year. That was
14	(12:15 p.m.)		14	th	e plan. Now you have mentioned you've read
15	MR. DIDOMENICO:		15	th	e transcript, so you do know that there is
16	A When you use the word "weight" to me	it	16	SO	me uncertainty with respect to Hydro's plans
17	implies having some numerical value and	in	17	fo	r the existing black start diesels at this
18	decisions of this type, you're often left with		18	nc	bint in time as to whether they will be
19	the experience of the managers that are		19	ar	polying for approval to keep them in service
$ _{20}$	involved in making those decisions not a		20	as	black start
$ _{21}^{20}$	weight per se. I think that the people that	*	21	MR DI	OMENICO:
22	are best positioned to make that judgment a	re	22	A G	enerally I'd say generally aware yes
23	the folks that have been living and breathing	, ,	23	GREEN	F OC:
$ _{24}^{-5}$	the operation of the system and the unit in	>	24	0.0	kay. But at the time Hydro applied and got
25	particular for a number of vears, and I rely		25	ar	poroval, the black start diesels were to
	P	age 154		1	Page 156
1	on that.		1	re	main in service for just over a year, and we
2	GREENE, O.C.:		2	st	ill don't know what's going to happen with
3	0. So your opinion, you relied on Hydro's		3	th	em at this point. So if we could go to
4	assessment with respect to all of this? Isn't		4	Li	berty's reply of September 17th, page 21.
5	that correct? Not just the minimization of		5	ar	id can you keep scrolling down? And here.
6	cost.		6	th	is goes to Liberty's recommendation that
	MR. DIDOMENICO:		7	H	vdro not be allowed to recover the cost for
8	A. No. not at all. Not all of it. no. What I'm		8	th	e black start system because of its
9	saving is that if you you asked me what		9	in	prudence. And here, Liberty is saying
10	particular weight we should put on reliabilit	V	10	"H	Ivdro first lost its capability for black
111	and I'm saving that it's not a numerical valu	ie	11	sta	art at the Holyrood plant in 2010. At that
12	and that the best source of how to value the	;	12	pc	bint. Hydro became deficient in meeting a
13	ability are the people that are running the		13	Ve	erv critical system need. Hydro allowed that
14	unit. No consultant can come in and tell vo	u	14	de	ficiency to continue until mid-2014, a
15	how to run your system without knowing	the	15	DE	riod of 52 months. Hydro finally
16	information that the people that are working	g	16	es	tablished black start capability at the
17	there know.	5	17	Н	olyrood plant with a temporary solution that
18	GREENE, O.C.:		18	fil	led its need for 12 months. In summary,
19	O. And there is another step as well, isn't		19	H	vdro had an obligation to provide a critical
20	there? While the utility has the information		20	sv	stem need for 64 months, vet met its
$ _{21}^{-5}$	on cost, as well they always must establish	0	21	oh	bligation for only 12 months. Hvdro claims
22	the regulator that they are making the right		22	it	is due compensation for that 12 months, but
23	balance of the cost versus reliability?		23	W	hat about the 52 months of failure?"
24	MR. DIDOMENICO:		24		So that's Liberty's position with respect
25	A. Absolutely.		25	to	f the Board does find that Hydro acted

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1	imprudently with respect to the black star	rt	1		from an apparent placing that the decision to
2	project, what the disallowance should be.	And	2		follow the Board order and put in the diesels
3	what I wanted to ask you, if the Board read	ches	3		that have been deemed very critical was a bad
4	a contrary decision, in fact they find that		4		decision and that that should be allowed on
5	the black start project was indeed imprude	nt,	5		its face disallowed on its face.
6	what would your opinion be with respect	to	6	GREE	ENE, Q.C.:
7	what the disallowance should be?		7	Q.	So you're relying on a Board order. But the
8	MR. DIDOMENICO:		8		Board order that approved the black start
9	A. That's an area that I'm not sure I can comm	ment	9		diesel specifically said that the recovery of
10	on right now. It wasn't something we've l	been	10		the cost was a separate issue.
11	asked to look at.		11	MR. A	ATHAS:
12	GREENE, Q.C.:		12	A.	No, that's right, and there's many utility
13	Q. Okay. You would agree that if Hydro	is	13		practices that we've been involved with where
14	allowed to recover the full cost of the blac	k	14		there's been deferred recovery which is not
15	start diesel and if the Board does find		15		guaranteed, and I didn't imply that it was
16	imprudence, there would be no penalty sar	nction	16		guaranteed. I implied that it would get I
17	or negative for Hydro?		17		would expect that at some time it would get,
18	MR. DIDOMENICO:		18		you know, some degree of review for whether
19	A. I guess I would disagree with that.		19		the manner of which they acquired the diesels
20	MR. ATHAS:		20		and the practicum of projects of putting them
21	A. I think we disagree with that because one	part	21		in place were all done prudently and the fact
22	of that omelet that you didn't say is if they	7	22		that those diesels did prove used and useful
23	find imprudence and they don't and th	ley	23		are the standards that we are more closely
24	implement some other penalty, that's some	ething	24		experiencing with a recovery of investment.
25	that could happen. What we've spent w	vhat	25		So that, but associating recovery of the
		Page 158			Page 160
1	we've highlighted a little bit in our report		1		investment with an inaction at some other time
2	is that the nature of that decision to put in		2		is misleading, in my frame of mind.
3	the diesels as a response to a Board Order	and	3	GREE	ENE, Q.C.:
4	to the Board communicating the importan	ce of	4	Q.	So if there is a finding of imprudence by the
5	the diesels. Besides the order it was the		5		Board, I'm still not sure you do
6	very fact that their conclusion was it was	ŝ	6		acknowledge that if there is no negative
7	very important to have that coverage. That	t is	7		consequence for Hydro, what would be the
8	a used and useful investment.		8		incentive for the utility to act prudently in
9	The association of a penalty with the		9		the future? Is there normal should there
10	cost of the diesels by Liberty is, at best, a		10		be an attachment of a negative consequence
11	convenience of saying that's the best place	÷	11		when we have the very serious finding by a
12	that could be an easy place to take the mor	ney	12		regulator that there has been imprudence?
13	and it's really and we're just trying to		13	MR. I	DIDOMENICO:
14	highlight that the we've tried to highligh	it	14	А.	I think the concept or the notion that unless
15	that the decision to put in the diesels and		15		a utility is financially penalized they won't
16	get recovery and expect recovery of the	at	16		take action to correct past deficiencies is
17	money is something that we would think	that	17		unfortunate. I think this very proceeding has
18	Poord order to get an investment in glass	1a	18		shown that a great many changes have already
19	Board order to put an investment in plac	e,	19		taken place and are continuing to take place
20	they would get recovery of that.		20		without any finding one way or the other on
$\begin{vmatrix} 21 \\ 22 \end{vmatrix}$	whether or not there is a separate ruling	; to he	21		appropriate the second se
$\begin{vmatrix} 22\\ 22 \end{vmatrix}$	imposed that even could be the event	io be	22		and this is fundamental to our resition
23	dollars of thet it's important to here the	ant of	23		relative to Libertu's On many fronts and
$\begin{vmatrix} 24 \\ 25 \end{vmatrix}$	that decision of any improvement of any	ltv	24		agree with many of the suggestions that
123	mat decision of any improvence of penal	ny	123		agree with many of the suggestions that

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1	Liberty has put forward. Where we disagree is	1	A. Certainly.
2	at that level of imprudence. Performance	2	GREENE, Q.C.:
3	improvement versus level of improvement.	3	Q. If we could move to unit one and here your
4	Hindsight versus progressively looking	4	August 7th report, your reply, page 21 of 39.
5	forward. We disagree on those elements, but	5	And again, on the very first sentence under
6	we don't disagree that a number of actions can	6	your review and conclusions. "The issue here
7	be taken and are in fact being taken by Hydro	7	is not whether Hydro's existing processes and
8	to improve their situation going forward.	8	procedures relative to the lube oil system
9	MR. ATHAS:	9	could be improved upon. There is no
10	A. I also would just add that to infer maybe	10	disagreement on that point." So again, you're
11	if I misinterpreted your question to infer	11	not taking issue with the fact that Hydro
12	that there would be no reaction stigma	12	needed to change its process and its
13	associated with a finding of imprudence	13	procedures. The question is whether those
14	without a financial penalty, I think is	14	that were in place at the time rose to the
15	mistaken. I would think I can't imagine a	15	level of imprudence. Is that what you're
16	utility management that would seriously think	16	saying?
17	about its business even more so than just is	17	MR. DIDOMENICO:
18	going on in this proceeding if they were	18	A. That's correct.
19	labelled with the "P" word of questioning	19	GREENE, Q.C.:
20	their prudence and so that I think is, in	20	Q. When I read your report, this first report,
21	itself, prior to as my colleague mentioned,	21	you dealt only with the issue of the lack of
22	prior to monetary penalties itself is a	22	testing for the adequate lube oil flow for the
23	profound statement to be made by the Board.	23	DC system. Is that correct? The couple of
24	GREENE, Q.C.:	24	pages that deal with it here didn't get into
25	Q. Yes, and I guess that's what we're all	25	any of the inadequacies that existed with the
	Page 16	2	Page 164
1	struggling with here. It's to assist the	1	motor. That's correct, isn't it? You only
2	Commissioners when they're looking at this	2	dealt, in your initial report, with respect to
3	when they go to their offices and have to look	3	the lack of testing of adequate flow for the
4	at all of the information, and if they do make	4	DC system?
5	a determination that in their finding that	5	MR. DIDOMENICO:
6	Hydro was imprudent, again to give additional	6	A. That's correct.
7	opinions to assist the Board with the next	7	GREENE, Q.C.:
8	step. So I take from your response that the	8	Q. Okay. And essentially, I summarized when I
9	finding of imprudence itself is very	9	read it, and again we ve read it more than
	significant. No utility likes the regulator	10	the fact that your primary reason for soving
	to say that they have acted improvement.	11	that Hydro had not been imprudent with respect
12	that was identified as a result of this work	12	to the failure to test, for adequate lube oil
13	is that will ensure or lessen the risk of	13	is that they relied on an opinion of the
14	repeats and that no financial penalty or	14	original equipment supplier some 40 years ago
16	consequence to Hydro in addition is required	16	or 40 odd years ago. So the principal defence
17	In your opinion is it ever required by a	17	was nobody told Hydro that they should do it
18	regulator for imprudence?	18	MR. DIDOMENICO:
19	MR. ATHAS:	19	A. I'm just thinking about how I should answer
20	A. I'd prefer not to speculate with is it ever	20	that.
$\left \begin{array}{c} 21 \end{array} \right $	required.	21	GREENE, Q.C.:
22	GREENE, Q.C.:	22	Q. And the -
23	Q. Are you aware of situations where it has been	23	MR. DIDOMENICO:
24	awarded?	24	A. The issue here is that in an operating
25	MR. ATHAS:	25	environment at a power plant, there are lots

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1	of issues coming up on a daily basis for any	1	1	appropriate.
2	facility, not specific to Hydro. Lots of	2	2 0	GREENE, Q.C.:
3	things going on. To expect an entity to be	3	3	Q. And under number 11 on page eight, what I
4	investigating things that have never been a	4	4	wanted to bring you you just expressed your
5	problem in 90 years worth of operating	5	5	first sentence, which is you disagree with the
6	history, never has come up, never has been a	6	6	statement, but the second sentence, "La Capra
7	problem, to expect them to be sitting around	7	7	Associates agrees that a functional test of
8	looking for things like that that have never	8	8	the system must verify that the system works
9	happened, while it would be admirable, it	9	9	as intended."
10	doesn't usually work that way. There are too	10	0 N	MR. DIDOMENICO:
11	many issues that have to be addressed in the	11	1	A. I'd agree.
12	short term to expect them to do that. That's	12	2 0	GREENE, Q.C.:
13	why we talk about reasonable versus imprudent.	13	3	Q. So we know that in order for the motor to
14 (12	2:30 p.m.)	14	4	work, the motor had to work and had to provide
15 GR	EENE, Q.C.:	15	5	adequate lube oil and in order for Hydro to
16	Q. And actually, that answer is what I had	16	6	have verified that the DC lube oil system
17	expected you to say and I was struck in	17	7	worked, wouldn't it have been that there was
18	reading your report, and also in some of the	18	8	adequate flow to keep the motor going?
19	evidence that Hydro has given, that has been a	19	9 N	MR. DIDOMENICO:
20	typical response of Hydro in some of these	20	20	A. Again, this speaks to Hydro's reliance on OEM
21	cases, "look, we never had a problem. So why	21	21	specification and direction from their on-site
22	should we foresee it? Why should we have	22	22	experts that they have on site on a regular
23	taken action?" and you sort of repeated that	23	23	basis. They rely on that expertise. None of
24	again.	24	24	that expertise flagged this as an issue and
25 MF	R. DIDOMENICO:	25	25	I'm betting that largely because it had never
	Page	166		Page 168
1	A. I did.	1	1	come up as an issue. But it's not just Hydro.
2 GR	EENE O.C.:	2	2	Hydro had hired people to be on site, both the
3	O. So let's start with I guess you would agree	3	3	turbine experts, boiler experts, what have
4	that the lube oil system was a critical system	4	4	vou, to oversee their operation because they
5	at the Holyrood plant?	5	5	realize that they need assistance technically
6 MF	R. DIDOMENICO:	6	6	on these systems. None of those people
7	A. Certainly.	7	7	identified this as an issue.
8 GR	EENE, O.C.:	8	8 0	GREENE, O.C.:
9	O. You would agree that the failure of the lube	g	9	O. So reliance absolves the owner of the plant?
10	oil system could cause catastrophe damage to	10	0 N	MR. DIDOMENICO:
11	the unit and in fact there was a potential for	11	1	A. Using the term "absolves", as if it means they
12	personal safety issues?	12	2	don't care and they don't have any problem.
13 MF	R. DIDOMENICO:	13	3	That's not the case, that's not the case, it
14	A. I would agree.	14	4	does not absolve anybody, but it puts a
15 GR	EENE, Q.C.:	15	5	context around why things happen. Nothing is
16	Q. Liberty has said in its report that it's	16	6	bullet proof.
17	common sense to test a system. Would you	17	7 0	GREENE, O.C.:
18	agree with that? And in fact, here I'd like	18	8	Q. Okay, so in this particular case, they're
19	to take you to your surrebuttal, page eight.	19	9	saying that the original equipment supplier
20 MF	R. DIDOMENICO:	20	20	didn't tell them to test the adequate lube oil
21	A. I would object to the term "common sense". I	21	21	flow that it actually did flow, you have
22	think that undervalues the individuals that	22	22	acknowledged that that was important. It
23	are responsible for this kind of work on a	23	23	wasn't enough the motor started, it had to
24	daily basis. It trivializes what they do on a	24	24	actually get appropriate oil and the next
25	daily basis and I don't think that's	25	25	part, I guess of your opinion was, that well,

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1	and here we can go to page 21 of 39 o	f your 1	1	GREENE, Q.C.:	-	
2	original one. It had been in place for	a 2	2	Q. That the lube oil system funct	ioned, yes, but	
3	number of years, there had been no inci	dent.	3	we don't know if -		
4	MR. DIDOMENICO:	2	4	MR. DIDOMENICO:		
5	A. And again, I need to add that it wasn't	just 5	5	A. The specific elements, yes.		
6	the OEM specification. They had expe	rts on e	6	GREENE, Q.C.:		
7	site that they were relying on, in addition	n to 7	7	Q if it was the AC or the DC an	d we know it	
8	that specification to oversee their opera	tion 8	8	was the DC system that failed	that day because	
9	and they didn't flag this as an issue.	ç	9	it was inadequate lube oil flow	V.	
10	GREENE, Q.C.:	10	0	MR. DIDOMENICO:		
11	Q. And one of the reasons for both is that	they 11	1	A. Right. Yes, I would agree wi	th that, but if	
12	didn't have a problem in the past.	12	2	you're asking me whether I kr	now whether the DC	
13	MR. DIDOMENICO:	13	3	system failed or not, if it was	ever called	
14	A. That's correct.	14	4	upon, you see what the conse	quences when it	
15	GREENE, Q.C.:	15	5	doesn't work.		
16	Q. And I guess in looking at this, I was try	ying 16	6	GREENE, Q.C.:		
17	to determine how did we know they new	ver had a 17	7	Q. Right, and that's, we don't k	now if it was	
18	problem in the past and in fact, Hydro	was 18	8	called upon before. We know	the faulty motor	
19	asked that question. Can we go to first	PR- 19	9	was in place for four years. Th	ne faulty motor	
20	PUB-NLH-201. So we were talking abo	out a 20	0	-		
21	failure of the DC system to work becau	ise it 21	1	MR. DIDOMENICO:		
22	couldn't provide the adequate flow of o	il, and 22	2	A. I think you're drawing a co	nclusion that	
23	here the question was, "Please tell u	is, 23	3	doesn't have a basis.		
24	provide the dates in which the Holyroo	d unit 24	4	GREENE, Q.C.:		
25	one and DC lube oil pumps were called	on to 25	5	Q. Well we know the faulty moto	or went in in 2009	
		Page 170			Page 172	
1	supply adequate lube oil to the turbines	s and 1	1	and when we went to ask Hyd	dro to provide the	
2	the degree to which they functioned pro	perly?"	2	number of times the DC system	n functioned, they	
3	So that was the question and that ques	stion 3	3	said their records weren't ab	le to provide	
4	referred us to another one, we need to g	jo back	4	that data for us.	-	
5	to the other question and this was the d	ates 5	5	MR. DIDOMENICO:		
6	when all (phonetic) had to provide wh	en the ϵ	6	A. Agreed.		
7	lube oil pump system worked. So it v	vasn't 7	7	GREENE, Q.C.:		
8	just the DC one, which is the one we	i're 8	8	Q. So I'm trying, when I looked	at that, I said	
9	talking about that failed, which didn't l	nave 9	9	how can I draw the conclusion	on that the DC	
10	adequate flow, it was for the AC, we hav	ve the 10	0	system actually has functioned	d as intended?	
11	primary AC system, we have the back	up AC 11	1	MR. DIDOMENICO:		
12	system and we have the DC system, and	l it was 12	2	A. Because if it had been called	upon and was	
13	the DC system that failed, and that was	what 13	3	unable to function properly, y	you would have	
14	PR-PUB-201 asked about. So if you scrol	l down 14	4	had a catastrophic failure, m	ultiple times	
15	that answer, we see in the last paragrap!	h that 15	5	over.		
16	Hydro doesn't maintain the data to be a	ble to 16	6	GREENE, Q.C.:		
17	show which of the systems was function	oning, 17	7	Q. Like we did in January 2013,	right.	
18	which wasn't functioning. So in fact, t	based 18	8	MR. DIDOMENICO:		
19	on the evidence on the record, we don'	t know 19	9	A. But again, over 45 years,	nothing had	
20	if the DC pump system functioned prope	erly. 20	0	occurred. By implication, the	ne system was	
21	MR. DIDOMENICO:	21	1	operated properly when neede	ed.	
22	A. Can we scroll down a little bit further	on 22	2	GREENE, Q.C.:		
23	this? I was just trying to figure out wh	1ch 23	3	Q. But unfortunately we don't ha	we the proof that	
24	one it was, but I mean, here we do have	ve a 24	4	it actually did function as inter	nded.	
25	record going back to 1990.	25	5	MR. DIDOMENICO:		

Page 173P1A. We don't have the direct proof, you're right.1should have detected the problems with the2GREENE, Q.C.:1should have detected the problems with the3Q. No, and we do know we had a faulty motor in3that correct?4there for at least four years when the DC4MR. DIDOMENICO:5system wasn't called upon to work. So your5A. That was his testimony. I would add a comr6first report, as I said, dealt with the6to that, that in addition to that. I would	nge 175 e nent
1A. We don't have the direct proof, you're right.1should have detected the problems with th2GREENE, Q.C.:1should have detected the problems with th3Q. No, and we do know we had a faulty motor in2motor before it was returned to the plant, is4there for at least four years when the DC3that correct?5system wasn't called upon to work. So your5A. That was his testimony. I would add a comr6first report, as I said, dealt with the6to that, that in addition to that. I would	e nent
 2 GREENE, Q.C.: 3 Q. No, and we do know we had a faulty motor in 4 there for at least four years when the DC 5 system wasn't called upon to work. So your 6 first report, as I said, dealt with the 2 motor before it was returned to the plant, is 3 that correct? 4 MR. DIDOMENICO: 5 A. That was his testimony. I would add a comr 6 to that, that in addition to that. I would 	nent
3Q. No, and we do know we had a faulty motor in there for at least four years when the DC3that correct?4there for at least four years when the DC4MR. DIDOMENICO:5system wasn't called upon to work. So your5A. That was his testimony. I would add a comr6first report, as I said, dealt with the6to that, that in addition to that, I would	ient
 there for at least four years when the DC system wasn't called upon to work. So your first report, as I said, dealt with the to that, that in addition to that, I would 	nent
5 system wasn't called upon to work. So your 6 first report, as I said, dealt with the 6 to that, that in addition to that, I would	hent
6 first report, as I said, dealt with the 6 to that, that in addition to that, I would	lly
	lly
7 testing of the adequate lube oil flow, it was 7 suggest that there other possibilities, namely	: illy
8 only in your surrebuttal that we got into the 8 that something occurred during transport of	e ılly
9 additional problems with the motor, so what 9 something occurred during installation. Th	ılly
10 you were dealing with initially was the 10 simple reality was nobody knows what actu	
11failure to detect through testing that we had11occurred. We just don't know.	
12 a problem with the motor. What I want to talk 12 GREENE, Q.C.:	
about now which is what you addressed in your 13 Q. And so we had a problem with the motors, w	hich
14 surrebuttal was the fact that the motor was 14 you're saying we don't know what the prob	lem
15 faulty to begin with. You only dealt with the 15 was or when it occurred. We know that Hy	lro,
16 second one so far which was, well the test, 16 even when the motor was returned, didn't te	st
17 they didn't do a test to determine that it 17 to see, to make sure they had the test	
18didn't work. So as you know, from Liberty's18results, nor did they test at that time for	
19 report, there were three problems with the 19 adequate lube oil flow. So the motor was	
20 motor. One was the flush boxes were offset 20 faulty, no test done to detect thethat we	
and the other was the motor's neutral plane 21 can prove that repairs were done and three,	10
22 was misaligned and then there was a resister 22 test done when it was put in place to see if	
23 setting at the plant. We know from the 23 the system functioned.	
24evidence to date that the contract that Hydro24 MR. DIDOMENICO:	
25 had with the contractor who actually did 25 A. But you're presuming the motor was fault	/.
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1 repair the motors required that tests be done 1 You started your statement by saying the mo	tor
2 on the motor and that the test results be 2 was faulty.	
3 provided to Hydro at the time of the return of 3 GREENE, Q.C.:	
4 the motor, is that correct? 4 Q. Well it had problems.	
5 MR. DIDOMENICO: 5 MR. DIDOMENICO:	
6 A. That's correct. 6 A. Why would they go intoa 45 year operation	ng
7 GREENE, Q.C.: 7 history, never had a problem, motor shows	р,
8 Q. I guess you would agree that that is a good 8 I assume it's faulty, why would I do that?	
9 quality oversight requirement and good 9 GREENE, Q.C.:	
10 practice? 10 Q. I didn't say anything about whether Hydr)
11 MR. DIDOMENICO: 11 would have assumed or not, but I understa	ıd
12 A. I would.	;
13 GREENE, Q.C.: 13 were problems with that motor?	
14 Q. And why would it be important to do that? 14 MR. DIDOMENICO:	
15 MR. DIDOMENICO: 15 A. Yes, there were problems with the motor.	
16 A. TO SIMPLY VERTY What had happened. 17 CREENE, Q.C.:	
17 GREENE, Q.C.: 17 Q. Okay. I didn't go to the next step as to what 18 Q. Okay. I didn't go to the next step as to what	_
Now you were also present this morning when	1
19 Now you were also present this morning when 19 its contractor.	
20 IVII. LEDIEW gave evidence in response to 20 MK. DIDOMENICO:	
121 questions from with freming where, as i 121 A. Okay, but again, that's after the fact, but	
22 understood the evidence, not having the 22 yes. 23 benefit of the transcript that Mr. LeDrew 23 CREENE O.C.	
23 = 23 = 23 = 23 = 23 = 23 = 23 = 23 = 24 =	re
25 or if done, it wasn't done properly because it 25 this has nothing to do with the findings of	,

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1	prudence and I'd like to go to Libert	v's	1	An	d I guess at this point Hydro has testified	
2	report, page 63, Liberty's July 6th report	ort. 2	2	tha	t it has not done any further analysis in	
3	And I just wanted to make sure I unders	stood La 3	3	ado	lition to the work that it has done on the	
4	Capra's position, and again, it's not rele	evant 4	4	AC	systems. So Hydro hasn't actually done any	
5	for the issue before the Board, it's on	ly 5	5	ana	lysis with respect to this issue, have	
6	relevant in terms of going forward to se	e if 6	6	the	y?	
7	there's still a risk of failure and from the	at 7	7 N	MR. DID	OMENICO:	
8	perspective. As I understood what Libe	rty was 8	8	A. I w	ould just add in addition to the AC system,	
9	saying there, the AC system was lost, re	lied 9	9	the	y have also done work on the DC system, so	
10	on the DC system, which was the third li	ine of 10	0	bas	ically they've worked on the entire lube	
11	defence and they raised a concern about	that, 11	1	oil	system.	
12	that when you're down to the DC system	1 because 12	2 0	GREENE	, Q.C.:	
13	the other two systems have failed becau	se of a 13	3	Q. Th	at's fair.	
14	loss of power, that could be called a con	mmon 14	4 N	MR. DID	OMENICO:	
15	mode failure, and raised the issue as	to 15	5	A. Fai	r enough.	
16	whether Hydro should consider any add	ditional 16	6 0	GREENE	, Q.C.:	
17	action with respect to taking into account	nt the 17	7	Q. Bu	t they haven't done any additional analysis	
18	risk associated with that. Would you lik	se to 18	8	to	determine the risk of the common mode	
19	add anything as toare you happy with	how I 19	9	fail	ure that Liberty describes, what would be	
20	have described Liberty's concern or was	s there 20	0	the	options of addressing it in terms of cost	
21	anything you would like to add to it?	21	1	and	l reliability, is that correct?	
22	MR. DIDOMENICO:	22	2 N	MR. DID	OMENICO:	
23	A. No, I think you summarized their conce	rns. 23	3	A. I h	ave not seen a formal analysis of that, no.	
24	GREENE, Q.C.:	24	4 (GREENE	, Q.C.:	
25	Q. Okay, and then when I went to your re	sponse 25	5	Q. Ok	ay, so both you and Hydro are saying that	
		Page 178			Page 180	
1	and we can go to it, if you like, the way	y I 1	1	bec	cause we've done work on the DC lube oil	
2	understood your response to be and in	fact, 2	2	sys	tem, don't worry about the common mode	
3	Hydro's response when they gave evid	lence at 3	3	fail	ure, but no analysis has been done?	
4	the hearing, was we have done, tal	ken 4	4 N	MR. DID	OMENICO:	
5	additional steps to ensure the integrity	of 5	5	A. Wo	ork, again, has been done on both the AC and	
6	the first two systems, so that we don't the	nink 6	6	the	DC system.	
7	that the risk of failure is going to occu	ir 7	7 (GREENE	, Q.C.:	
8	again, so don't worry about the fact that	t we 8	8	Q. Bu	t in terms of the analysis of the risk of a	
9	might be down to the DC system and on	ly have 9	9	cor	nmon mode failure as described by Liberty,	
10	one system in place. Is that a layman	n's 10	0	the	options to prevent it, the cost, the	
11	summary of it?	11	1	reli	ability implications.	
12	MR. DIDOMENICO:	12	2 ((12:45 p	.m.)	
13	A. Yes.	13	3 N	MR. DID	OMENICO:	
14	GREENE, Q.C.:	14	4	A. It h	as not been done in a formal documented	
15	Q. Okay, and now I did want to take you	to, if 15	5	wa	у.	
16	you go to page 22 of your first reply bec	cause 16	6 (GREENE	, Q.C.:	
17	in your surrebuttal you simply restated	what 17	7	Q. Ok	ay. So if we could just talk about unit 1	
18	was in your original report. And you sa	y, at 18	8	and	l again, your conclusions, as a customer, I	
19	some point, this is on the bottom of pag	ge 22 19	9	gue	ess I would want to go through each fact and	
20	of 39. You say, "At some point a util	ity 20	0	the	n your conclusion, and as I do, we'll stop	
21	needs to ask itself how much redundan	icy is 21	1	to s	see if you agree. The first fact I think	
22	enough. Any analysis, such as this, nee	ds to 22	2	tha	t's undisputed is the fact that adequate	
23	account for not only the cost of potent	1al 23	3	lub	e oil is critical for the unit to work and	
24	benefits, but also the likelihood of	24	4	wit	hout adequate lube oil, then there is a	
25	occurrence over the unit's remaining 1	1te. 25	5	pot	ential for severe damage?	

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1	MR. DIDOMENICO:	1	1 motor, that is Mr. LeDrew's evidence this
2	A. Agreed.	2	2 morning.
3	GREENE. O.C.:	3	3 MR. DIDOMENICO:
4	O. It is also because it is so critical that	4	4 A. It's certainly likely that that would be the
5	there are three systems for the supply of lube	5	5 case.
6	oil to the units at Holyrood?	6	6 GREENE O.C.:
	MR. DIDOMENICO:	7	7 O Okay. So now we know that in January 2013
	A Agreed	8	8 with those series of events that I just took
9	GREENE OC:	9	9 you through we know that there was an
10	O Okay The next fact is that it is a rare	10	0 inadequate lube oil flow that the unit
11	event or not that often that we need to go to	11	1 failed there was serious consequences 9 or
12	the third lube oil system to supply the oil	12	2 10 million dollars and as I said in thinking
13	MR_DIDOMENICO	13	about each of these actions as a rate paver
14	Δ Yes	14	and as a customer of Hydro in those
15	GREENE O.C.	15	5 circumstances you believe that it Hydro was
16	O We don't know for sure how many times in the	16	6 not imprudent and that the customers of Hydro
17	past the DC lube oil system was actually	17	7 should have the cost of damages for that unit?
18	required to work or did function?	18	8 MR DIDOMENICO:
19	MR DIDOMENICO	19	9 A I do not believe that they were imprudent in
$ _{20}^{1}$	A For sure we don't know no	20	this case no not at all for all the reasons
$ _{21}^{20}$	GREENE OC:	20	we have already discussed. I could summarize
$ _{22}^{21}$	O We know that Hydro did not test for adequate	21	2 if you like
$\begin{vmatrix} 22 \\ 23 \end{vmatrix}$	lube oil flow because in part they relied on	23	3 GREENE O.C.
$\begin{vmatrix} 23 \\ 24 \end{vmatrix}$	the original supplier and they relied on the	23	4 O But you don't disagree with any of the facts
25	fact that there hadn't been an incident in the	25	5 that we just went through?
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	past, is that correct?		1 MR. DIDOMENICO:
	MR. DIDOMENICO.		2 A. I don't disagree with the individual elements
	A. They rened on men original OEM		antire picture, you're just going down a list
	the staff that was on hand to oversee the	4	 entire picture, you rejust going down a list of fasts
	operation	5	5 OFFENE O.C.
	CREENE O.C.		7 O And you draw a different conclusion than
	O They also had required that tests be done on		 Q. And you draw a different conclusion than L iberty did from the very same facts?
	the motor prior to its return to the plant to		9 MR DIDOMENICO:
	ensure that the motor was in good condition	10	0 A I do Absolutely
	MR_DIDOMENICO	11	1 GREENE OC
12	A Yes	12	2 O And that L as a customer may also draw or
13	GREENE O.C.	13	any customer when looking at those -
14	0. We know that neither Hydro nor the contractor	14	4 MR DIDOMENICO
15	can provide proof that those tests were done.	15	5 A. I don't know what the typical customer would
16	is that correct?	16	6 think.
17	MR. DIDOMENICO:	17	7 GREENE O.C.
18	A. That's correct.	18	8 O. But you do, there's no dispute with the facts
19	GREENE, Q.C.:	19	9 as we just went through. Okay, those are all
20	O. We also know generally that if the test had	20	0 my questions, thank you.
21	beenalthough I think you may not agree with	21	1 CHAIRMAN:
22	me on this one, although I think Mr. LeDrew	22	2 Q. Okay, I guess we're over to Mr. O'Brien.
23	did this morning, that if the test had been	23	3 MR. PHILLIP DIDOMENICO, CROSS-EXAMINATION BY MR. LIAM
24	done, it would have detecteddone properly,	24	4 O'BRIEN
25	it would have detected the problems with the	25	5 MR. O'BRIEN:

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1	Q. Thank you, Mr. Chair. Good morning gentleme	en,	1	A	A. I'm sure v	ve asked for some clarifications on
2	or good afternoon, I should say. It would		2		some issu	es, but it wasn't anything that was
3	have been a good morning last week, how is		3		outside of	those two issues.
4	that. I'm going to start with, I want to get		4	MR.	. O'BRIEN:	
5	a little bit of background and really just		5	Ç	Q. Okay, and	have you taken any steps since doing
6	because I didn't note too much of a discussion		6		your repo	ort, say to review further
7	in your reports, just some sort of what		7		document	ation for the purposes of your
8	principles you would apply in terms of a		8		testimony	here today?
9	prudence review of this type. I saw in		9	MR.	. DIDOMENIO	CO:
10	Liberty's report there was a background given		10	A	A. Only what	t we justwe mentioned that we had
11	in terms of how they would apply certain		11		been look	ing at the transcripts.
12	principles there. What types of principles do		12	MR.	. O'BRIEN:	
13	you normally apply in a prudence analysis?		13	Ç	Q. Just the tra	anscripts, okay.
14	MR. DIDOMENICO:		14	MR.	. DIDOMENIO	CO:
15	A. I think in one of our responses we indicated		15	А	A. And only	the transcripts, I might add, that
16	that we were applying very similar, namely the		16		relate to th	nese two events.
17	notion ofdid they take actions at the time		17	MR.	. O'BRIEN:	
18	with the information they had available that		18	Ç	Q. Okay, all	right. The black start -
19	was reasonable.		19	MR.	. ATHAS:	
20	MR. O'BRIEN:		20	А	A. One secor	nd please.
21	Q. Okay, and that's really what you're looking	:	21	MR.	. O'BRIEN:	
22	at.		22	Ç	Q. Oh sure.	
23	MR. DIDOMENICO:		23	MR.	. ATHAS:	
24	A. Without the benefit of hindsight, let me add		24	A	A. Just to cla	rify, in the conversations that we
25	that.		25		had with	Hydro, then there was, then more
	I	Page 186				Page 188
	MR. O'BRIEN:		1		reports car	me to us that they had, either a
$\begin{vmatrix} 2 \\ 2 \end{vmatrix}$	Q. Okay, without the benefit of hindsight. And		2		data requ	est response that they got from
	in terms of at the time, it's the information		3		somedody	or some other kind of data and other
	and the individuals at the time that's		4		from Uvd	while we say an the information is
	made the decisions, is that right?		5		dronnod i	here and say, here, these are the
	made the decisions, is that right?		0		rosults of	conversations with various bodies
	MR. DIDOMENICO:		/ Q		to underst	and what's going on and based on our
	A. Absolutely. Right.		0		to undersu	you know come up to speed with
10	Ω		9 10		what the s	ituation was when the decision would
	followed I've got a fair understanding from		11		be made	induction was when the decision would
12	your discussion with Ms. Greene that this was		12	MR	O'BRIEN.	
13	a fairly your analysis, you only had so much		12	С) Sure And	d Lassume and just to carry through
14	time to do that when you initially got		14	×	on that p	oint, there are RFIs asked and
15	involved and in terms of having looked at		15		answered	after the fact of your first report.
16	only two issues here. I'm assuming you were		16		that kind o	of thing, that you would have been
17	just instructed based on your testimony to		17		given that	t information as well. after
18	look at these two particular issues?		18		following	or filing your first report? Is
19	MR. DIDOMENICO:		19		there anyt	hing additional?
20	A. That's correct.		20	MR.	. ATHAS:	6
21	MR. O'BRIEN:		21	A	A. Yes, we	had discussions after the first
22	Q. Okay. And the documents you reviewed, did y	ou	22		report, est	becially after Liberty filed their
23	request any additional documents after what		23		reply.	
24	you were given by Hydro to review?		24	MR.	. O'BRIEN:	
25	MR. DIDOMENICO:		25	Ç	Q. And I gue	ss I'm more focussed on whether or

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1	not you felt there was anything missing from	1	1	were aware if there were concerns that Hydro
2	the initial material that you had to ask for.	2	2	had back in 2008 about capacity issues maybe
	There was nothing of that concern?	3	3	looking out into the future and looking at
4	MR DIDOMENICO	4	4	whether or not they needed another CT
5	A Nothing of major consequence it was more	5	5	somewhere on the Avalon peninsula maybe in at
6	clarification related questions not that	6	6	Holyrood anywhere else were you aware of any
	something's missing	7	7	of those concerns?
	MR O'BRIEN		, 8 м	IR DIDOMENICO
9	O Okay and I'm going to try to focus must of my	9	9	A I was not
10	questions this morning on the black start	10	0 M	IR O'BRIEN:
11	issue because I think that Ms. Greene has	11	1	O I wonder if we could have a look at your
12	covered off the unit 1 turbine for the most	12	2	report at pageyour August 7th report page 3
13	part anything that I had questions on but	13	3	and I'm looking at page 3 at the bottom so
14	the black start there was just a couple of a	14	4	that would be page 5 of 39 And the first
15	few lines that I did want to cover with you	15	5	bullet there at the top their decision
16	First of all. I just wanted to get an idea for	16	6	"Since the Holyrood gas turbine was 42 years
17	the record as to what, what your definition of	17	7	old in 2008, the inspection revealed that a
18	black start would be?	18	8	significant amount of work was needed to be
19	MR. DIDOMENICO:	19	9	done to it, Hydro became concerned that the
20	A. My definition would be consistent with NERC's	20	0	unit may be approaching the end of its
21	definition which is the ability of a facility	21	1	reliable life." Is that something that was
22	to start without the aid of outside supply.	22	2	indicated to you in a conversation with Hydro?
23	MR. O'BRIEN:	23	3	Can you tell me where you got that
24	Q. Okay, so really when we talk about what	24	4	information?
25	Hydro's plan was from 2011 forward and using	25	5 M	IR. DIDOMENICO:
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1	Hardwoods it's not a true black start	1	1	A Can I scroll down a little bit? It is a
	scenario is it?	2	2	footnote I need to go to the bottom of the
	MR DIDOMENICO:	3	3	nage please. I believe it's footnote No. 2
4	A. This is where I want to clarify. When we	4	4 M	IR. O'BRIEN:
5	start talking about a region, as opposed to an	5	5	O. Yeah, it was footnoted in there and I just
6	individual unit, okay, you never did not have	6	6	wanted to know whether or not you had a
7	the ability to restart the Avalon peninsula.	7	7	similar discussion with Hydro in your
	you didn't have the ability to restart the	8	, 8	conversations over whether or not back in
9	Holyrood unit okay just to make that	9	9	2009 there was a concern at that time over
10	distinction clear.	10	0	the lifespan of that unit.
111	MR. O'BRIEN:	11	1 M	IR. DIDOMENICO:
12	O. Sure, okay.	12	2	A. I believe that came up, sure.
13	MR. DIDOMENICO:	13	3 M	IR. O'BRIEN:
14	A. Because sometimes it's used interchangeably	14	4	Q. Okay, all right, and would you have, based on
15	and I want to make sure that's clear.	15	5	that, would your thoughts on the
16	MR. O'BRIEN:	16	6	reasonableness and the decision at that point
17	Q. If we focus just on the Holyrood plant, then	17	7	in time to focus on refurbishment of the GT
18	there was, if you're going to use Hardwoods as	18	8	versus look at other options, can you give me
19	the option or the answer, the solution -	19	9	any comments on what you would have on that?
20	MR. DIDOMENICO:	20	0	If you're looking at a 42 year GT here which
21	A. I wouldn't call that black start for Holyrood,	21	1	Hydro is thinking is reaching the end of its
22	yes.	22	2	life, are there other options that should have
23	MR. O'BRIEN:	23	3	been considered at that time?
24	Q. Okay, all right, and thank you for that	24	4 M	IR. DIDOMENICO:
25	clarification. I wonder whether or not you	25	5	A. I'm not sure how to address that. I mean,

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1	there are always options. The notion that a		1	1	their system	planning considera	tions for other
2	gas turbine is 42 years old is certainly not		2	2	kinds of cap	bacity.	
3	unprecedented within North America. There a	re	3	3 MR	R. O'BRIEN:	-	
4	lots of very old combustion turbines, largely		4	1	Q. But now that	at you do know it, w	ould that change
5	because just the manner in which they are		5	5	your opinion	n at all in terms of t	he approach
6	utilized. Could they have looked at other		6	5	here for Hyd	dro in dealing with b	black start?
7	things? That's a system planning question,		7	/ MR	R. DIDOMENICO):	
8	it's probably one for Hydro's system planning	;	8	3	A. I don't belie	eve it does. Again, b	because your
9	folks, Mr. Humphries in particular.		9)	approach wa	as founded on the f	act that they
10	MR. O'BRIEN:		10)	were going	to make significant	investment in
11	Q. And would you havewell if I throw into the		11	l	that facility	to improve its available	ability.
12	mix then what I had asked you earlier, the		12	2 MR	R. O'BRIEN:		- •
13	concern about possible capacity issues, short-		13	3	Q. Okay, but th	nat's the Hardwoods	, yeah, okay.
14	term capacity issues, would that have been		14	I MR	₹. DIDOMENICO):	
15	something Hydro ought to have considered a	t	15	; 	A. That's Hard	lwoods, yes, 1t 1s.	
16	that time with respect to black start as well?		16	5 MF	₹. O'BRIEN:	· C · Il-in- main	1 • •
	MR. DIDOMENICO:		17	-	Q. I mean, I m	sort of talking prio	r to this in
18	A. Sure. It's somewhat outside the scope of what	t	18	} ~ (1.	terms or -		
19	We were asked to look at.		19) (1. ` MT	100 p.m.)		
$ _{21}^{20}$	MR. O'BRIEN:		20) NIR 1	(ATHAS:	lannor at times I me	oon the feet
$\begin{vmatrix} 21\\ 22 \end{vmatrix}$	Q. Okay.		21	י. א	A. WEII as a pr	anner at units, 1 m	an, the ract
$\begin{vmatrix} 22\\ 23 \end{vmatrix}$	MR. DIDUMENICU:		22	2	flevibility of	f the size and the 1	useu uie
$\begin{vmatrix} 2.3 \\ 2.4 \end{vmatrix}$	A. I liteally it is a regulation system planning offort I mean that's the kind of thing you		25) 1	short durati	ion of the installat	ion of a
$\begin{vmatrix} 2 \\ 25 \end{vmatrix}$	look at as part of normal system planning		24	; ;	combustion	turbine compared t	o other kinds of
	Pag	o 104				turonic, compared	Page 196
	MD O'DDIENI.	C 174	1	1	canacity to	figure out what the	right time
	• And it's not something you were asked to loo'	r	2	,	would be a	nd from the dialogu	a that was going
	at?	`	- 3	2	on it sound:	s verv normal, verv	common that
4	MR. DIDOMENICO:		4	, 1	that was goi	ing on and it surprise	ed me that it
5	A. No.		5	5	was, that pe	onle were talking a	bout both of
6	MR. ATHAS:		6	5	these in con	text, the issue of bla	ick start and
7	A. And clearly we're aware from the transcripts		7	7	the issue of	the need for system	capacity.
8	that there wasthat Hydro was evaluating		8	3 MF	R. O'BRIEN:	-	1 2
9	options for black start at Holyrood relative		9)	Q. Because the	ere's a duel role the	ere that CT
10	to their potential implementation of an, and		10)	could play f	for capacity and the	black start.
11	ultimate implementation of a combustion		11	MR	R. ATHAS:		
12	turbine at that site. That was also needed		12	2	A. Yeah, there?	's a potential for a d	uel role and
13	for general capacity, not black start.		13	3	it needs to b	be considered and of	bviously they
14	MR. O'BRIEN:		14	ł	thought it w	as a very good path	to rely on.
15	Q. Right.		15	5 MR	R. O'BRIEN:		
16	MR. ATHAS:		16	5	Q. Okay, and	do you knowdid	you have any
17	A. So they were going to get a two for one out of		17	1	understandi	ng in terms of how I	Hydro's thought
18	that investment, so to speak. So we now know	V	18	3	process may	y have changed over	the years from
19	about that, you know, we can't hide the fact		19)	2008 forwa	ird with respect to a	capacity and
20	what we've read.		20)	system plan	ning? That wasn't	part of your
21	MR. O'BRIEN:		21	1 • • • • •	review?	`	
$ ^{22}_{22}$	Q. SUIP.		22	2 MF	A No. it wasn'): ,_	
23	MR. ATHAS:		23) . 4 N/T	A. INO, IL WASH	ι.	
$ _{25}^{24}$	A. But it was not, as Mi. DiDomenico said, it's		24		(. AIHAS:	rt of our review	
25	not part of our scope to start looking at		25	, .	A. It wash t pa	it of our review.	

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1	MR. O'BRIEN:	1	1	With that information, ought they have to have
2	O. Did you know that in 2010 there was generation	2	2	considered different approaches to the black
3	planning support that indicated there was	3	3	start when you have Holyrood GT was out of
4	going to be system capacity issues as early as	4	4	service in 2010?
5	2015?	5	5 M	MR. ATHAS:
6	MR. DIDOMENICO:	6	6	A. Nothing, albeit very little knowledge that we
7	A. I wasn't aware of that.	7	7	have on that issue now, nothing that I know
8	MR. ATHAS:	8	8	now tells me that they didn't give fair
9	A. I think I might have seen that in the	9	9	consideration to all the options, including to
10	transcript. I'm not sure, but it sounds	10	0	some degree factoring in the knowledge that at
11	familiar, but it's familiar in the last couple	11	1	some point they would need system capacity.
12	ofin the last day, not necessarily -	12	2	So it doesn't change my view that the decision
13	MR. O'BRIEN:	13	3	was reasonable and their process was
14	O. It wasn't part of your review?	14	4	reasonable.
15	MR. ATHAS:	15	5 M	MR. O'BRIEN:
16	A. It certainly wasn't part of our review.	16	б	O. I wonder if we could look at page 5 here and I
17	MR. O'BRIEN:	17	7	think I'm looking at the bottom, so it's page
18	0. And you were aware then in 2010 there was a	18	8	7 of 39, the last bullet. This is March. 2010
19	stop work order on the Holyrood gas turbine.	19	9	and under the decision here. the last bullet
20	is that right?	20	0	here, you've indicated "Hydro informed the
21	MR. ATHAS:	21	1	Board about its decision to withdraw the
22	A. Correct.	22	2	overhaul proposal from its capital program and
23	MR. DIDOMENICO:	23	3	assess other options." So this is with
24	A. On the Holvrood?	24	4	respect to the Holyrood GT and the Board was
25	MR. ATHAS:	25	5	concerned about the lack of black start
1	A Yes on the Holyrood	1	1	canability at HTGS through so Hydro addressed
	MR O'BRIEN.		1 2	the problem by determining new generation
	O Veah Holyrood gas turbine at that point		2	ontions and also addressing the OHS stop work
	Q. Tean, Horytood gas tarbine at that point.		5 4	order concerns. What new generation options
	A You go back and forth between Hardwoods and	5	+ 5	were you aware of that were addressed in March
6	Holyrood	6	, 6	of 2010?
	MR O'BRIEN		ј 7 М	MR DIDOMENICO:
	O Lunderstand it confuses me sometimes too		7 IVI. 8	A The only options you say in March of 2010?
	Having known that there were concerns for	0	ом	MD O'RDIEN.
	capacity issues out into 2015, or now knowing	10	0	O Lib-hm Is that the nurchase of the new CT is
	that and also knowing there was a stop work	11	1	that essentially what's being -
12	order on the Holyrood GT would that change	12	л 2 М	MR_DIDOMENICO
13	your opinion at all as to how Hydro should	13	3	A That's really the only thing
14	have approached the black start issue?	14	, 4 м	MR ATHAS
15	MR ATHAS.	15	5	Δ The CT
16	A Now that's the definition of hindsight	16	, 6 М	MR O'BRIEN
17	MR O'BRIEN	17	7	O So you would have known when writing this
18	O No Lunderstand I'm justno no it's not	18	, 8	report that back in March 2010 Hydro would
19	necessarily the definition of hindsight I'm	19	9	have had in its mind the purchase of a new CT?
20	asking if you had of known that in preparing	20	∂ ∿∕	MR_DIDOMENICO:
21	your report, you told us today that you didn't	$\frac{20}{21}$	1	A. That they were considering that possibility I
22	know that information in preparing your	22	2	think that's fair to say.
$ _{23}^{22}$	report, presumably the individuals at Hydro.	$ _{23}^{22}$	- 3 М	MR. O'BRIEN:
$ _{24}^{-3}$	in 2010, knew that there was capacity issues	$ _{24}^{-3}$	4	O. Okay, that's fair to say, okay. One of the
25	on the horizon, on the short-term horizon.	25	5	things I wanted to ask you about, when I

Page 201Page 2011questioned Mr. Humphries, he's the VP of1"interim", 33 years, but I mean, so the fact2systems planning and operations, about Hydro's2that there is some fluctuation on the exact3generation planning, I was informed that Hydro3timing of the CT going in place and as a4hadn't decided or it appeared to me that in4matter of fact, there would be fluctuation of52010 Hydro hadn't made a decision on whether6or not the system plan for the future would6or not the system plan for the future would6do it because there's been times when project7have required a CT at that point in time. In7take a little longer, for whatever it is, from8fact, they were looking at two sort of9permeating conditions, from delivery and9options, two scenarios. One involving a fixed9anything else. So to narrowly say that you10link and one involving the isolated island10have to have that nailed, that decision, I11situation. In fact, I got the understanding11disagree.12from Mr. Humphries that the decision on13Q. And when you're talking about duration, so I14wasn't made until the end of 2012.14can understand what you're saying, you don'16A. I don't think we were trying to infer that a16you know this is what the final solution is17decision had been made. We were saying that17going to be, a CT is going to be in place,18there we	
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20 0. Oh no. I understand. 20 it's a matter of degree and that may be how	
21 MR. DIDOMENICO:21you would analyze it, is that right?	
22A. You just said athe decision.22MR. ATHAS:	
23 MR. O'BRIEN: 23 A. That's correct, I mean, there wasn't any way	
24 Q. I was just going to lead into a question, I 24 to probably do it or, and certainly no	
25 wanted to get your thought process on when you 25 evidence that it was done that there was a	
Page 202 Pag	ge 204
1 consider the reasonableness of the interim 1 detailed, quantitative analysis that	
2 option used to Hardwoods, should there not be 2 probabilistically said what could happen over	
3 some certainty around when the final proposal 3 a three year period that would tell people	
4 or the final solution is going to come about 4 that three is okay, four is no good.	
5 before you analyze the reasonableness of the 5 MR. O'BRIEN:	
6 interim solution? Do you know what I'm 6 Q. Okay, I was going to ask that, but I	
7 saying? I mean, there didn't seem to be some 7 understand.	
8 certaintythere didn't see to be any 8 MR. ATHAS:	
9 certainty as to when that solution was going 9 A. Nor do I think, the assumptions that people	
10 to come about and how do you analyze that in 10 would have to make in that analysis to get to	
11 terms of whether or not the interim solution 11 the point where three is okay, four is good,	
12 of Hardwoods was appropriate?	
13 MR. ATHAS: 13 crisp the statistic looks at the end, there's	
A. It's a matter of degree. You know, if you	
15 and this is just in general versus, if I was 15 MR. O'BRIEN:	
16 making a decision that unmatery an internition 16 Q. Sure.	
17 period would end when I had a new C1 there, 17 MR. ATHAS:	
18 and it might be five, and they're all the same	L
interim period from the standpoint of managing 20 on all the numbers that so into a quantitative	
20 Internin period from the standpoint of managing 20 off an the numbers that go into a quantitative 21 analysis but you know I'd like someone to	
21 misk versus costs, then you don't need to know 21 analysis, but you know, 1 u like sometime to 22 with certainty. If it's three years versus 33 22 show me sometime around planning aspects where	e
22 when containing. If it is uncer years versus 55 22 show the somethine around plaining aspects where 23 years you probably want to narrow that scope 23 there basn't been some degree of judgment put	<i>u</i>
because that would be in everybody's opinion 24 in	
25 here, too long a period to be labelled as 25 MR. O'BRIEN:	

Page 205 Page 207 Page 207 1 Q. Sure, well let's pat aside duration then, what 1 reasonableness is what we're all about in our 3 there was going to be a CT at all? How would 3 there wasn't or should have been consideration 4 that sort of enter into your though process	November 2, 2015 Mult		Multi-I	-Page TM		NL Hydro GRA
1 Q. Sure, well let's put aside duration then, what 1 reasonableness is what we're all about nout's investigation, so you know, to speculate that 2 if there's a question over whether or not 2 investigation, so you know, to speculate that 3 there wasn't or should have been consideration 3 there wasn't or should have been. consideration 4 on, that this was a permanent solution for a 5 very long range solution. I don't want to go 6 Hardwoods? Because up until the end of 6 there because I have no indication that. 7 November 2012, I understand the Cr was only 8 comversions with Hydro would have been. you know, 8 interim solution. 10 IMB. DIDOMENCO: 10 No. How here they indicated 13 made in 2012, in mid 2012, at a time when 14 solution. 15 MR. DIDOMENCO: 14 solution. 15 MR. O'BRIEN: 16 Q. And I never got any impression from any of the 15 MR. DIDOMENTO: 16 and here was always and ways. 17 10 And I never was anything other than an 16 A. Before I try to answer that, just to be clear, I 18 interim solution interim process fo			Page 205		_	Page 207
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14 MR. O'BRIEN:14 Q. Well for an interim period and what I'm15 Q. No, I understand.14 Q. Well for an interim period and what I'm15 Q. No, I understand.15 wondering at that point in time is had you16 MR. ATHAS:16 considered whether or not the fact that a CT17 A. And I would just categorize that in our16 considered whether or not the fact that a CT18 conversations and our readings, there is no19 indication that for whatever it closes out the19 indication that for whatever it closes out the19 MR. DIDOMENICO:20 period, the interim period, whether it's the20 A. That's a hypothetical that I guess I don't21 CT or some other option, that the decision of22 mR. O'BRIEN:23 Holyrood, resident to Holyrood, was viewed23 Q. In terms of it being hypothetical, we're24 was an interim decision. I mean, that was all25 min the context and that interim decision of	13	to be clear.	1	3	MR. O'B	RIEN:
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16 MR. ATHAS:16considered whether or not the fact that a CT17A. And I would just categorize that in our16considered whether or not the fact that a CT18conversations and our readings, there is no17may never come along, whether or not that19indication that for whatever it closes out the18decision was appropriate?20period, the interim period, whether it's the19MR. DIDOMENICO:21CT or some other option, that the decision of20A. That's a hypothetical that I guess I don't22exposure of not having black start at21agree with as a foundation for a question.23Holyrood, resident to Holyrood, was viewed23Q. In terms of it being hypothetical, we're24in the context and that interim decision of25particular time with the information that	15	Q. No, I understand.	1	5	WO	ndering at that point in time is had you
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 19 Indication that for whatever it closes out the 20 period, the interim period, whether it's the 21 CT or some other option, that the decision of 22 exposure of not having black start at 23 Holyrood, resident to Holyrood, was viewed 24 was an interim decision. I mean, that was all 25 in the context and that interim decision of 26 In terms of it being hypothetical, we're 27 talking about what decisions were made at a 28 period, the information that interim decision of 29 MR. DIDOMENICO: 20 A. That's a hypothetical that I guess I don't 21 agree with as a foundation for a question. 22 MR. O'BRIEN: 23 Q. In terms of it being hypothetical, we're 24 talking about what decisions were made at a 	18	conversations and our readings, there is	s no	8	dec	cision was appropriate?
 20 period, the interim period, whether it's the 21 CT or some other option, that the decision of 22 exposure of not having black start at 23 Holyrood, resident to Holyrood, was viewed 24 was an interim decision. I mean, that was all 25 in the context and that interim decision of 20 A. That's a hypothetical that I guess I don't 21 agree with as a foundation for a question. 22 MR. O'BRIEN: 23 Q. In terms of it being hypothetical, we're 24 talking about what decisions were made at a 25 particular time with the information that 	19	indication that for whatever it closes ou	t the	9	MR. DID	$\begin{array}{cccccccccccccccccccccccccccccccccccc$
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25 Horytood, resident to Horytood, was viewed 24 was an interim decision. I mean, that was all 25 in the context and that interim decision of 26 particular time with the information that	$ ^{22}_{22}$	Holymood resident to Holymood	at 2	22	MK. U'B	AIEN:
24 was an internin decision. I mean, that was an 24 taiking about what decisions were made at a 25 particular time with the information that	23	was an interim decision. I mean that we	2	23	Q. III	terms of it being hypothetical, we re
	$\begin{vmatrix} 24 \\ 25 \end{vmatrix}$	in the context and that interim decision	15 all 2°	24)5	tall	ticular time with the information that

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No	ovember 2, 2015 M	lulti-H	Page	e TM	NL Hydro GRA
	Page	209			Page 211
1	Hydro had. All we can look at is facts. I'm not asking about, sort of looking backwards, I'm asking in 2012 Hydro hedp't mede the		1 2 Ml	Q. And that's R. ATHAS:	what I'm asking, whether or not -
5 6	decision on whether or not, which scenario it was going to take, so with that information, they hadn't made the decision that a CT was		4 5 6	control ove whether been let's	er other options. We don't know I mean, the backup plan could have put the diesels in that are in
7	going to be in the future.	,	7	there now a	as a long term solution. If that
8 9	MR. DIDOMENICO: A. Excuse me for interrupting, but they hadn't		8 9	was the on period. Yo	ly way they could close the interim ou know, but I just don't I mean,
10	made a decision, but lots of options are under		0	it's witness	sed that they have other options
	consideration. There's ample evidence, I do		1	and it wit	nessed that it's within their
12	believe, that there was plenty of discussion		2	control, so	second guessing their comfort with
13	going around this issue. They hadn't made the		3	the use of 1	iterim planning is not something
14	decision, we agree.		4 5 (1	where I d I	ike to go.
15	MR. O'BRIEN:		5 (1 6 M	:15 p.m.)	
10	Q. Okay. And what I m wondering is when you look		6 MI 7	\mathbf{R} . O'BRIEN:	tin tarma of anon. Hudro had made a
	at that in terms of the reasonableness of that		/	Q. Okay. And	move forward with a CT we same to
18	decision, your evidence appears to be the		8 0	the and of	November and then the CT is part of
19	is coming?		9	hoth scores	rios at that point in time. Knowing
$ _{21}^{20}$	MP. DIDOMENICO:	2	1	that there y	hos at that point in time. Knowing
$\begin{vmatrix} 2 \\ 2 \\ 2 \\ 2 \\ 2 \\ 2 \\ 2 \\ 2 \\ 2 \\ 2 $	A That something was coming		י ז	Hydro's th	hought process in pursuing that
$\begin{vmatrix} 22 \\ 23 \end{vmatrix}$	MD ATHAS	2	2 3	nurchase o	f that CT?
$\begin{vmatrix} 2.3 \\ 2.4 \end{vmatrix}$	A That compating is coming. See that's the	2	5 4 Mi		\cap
24	it's within their power to control that the	2	4 MI	A No	0.
	Page /	210		11.1(0)	Daga 212
	Page.	210	1 1 1		Page 212
	assumption that this is going to be an interim		тмп э	K. U BRIEN:	a119
	solution is notural. It's yory		2 2 M	Q. Nothing at	
	MP DIDOMENICO:		5 WH 4	A No	0.
	A It's reasonable		4 5 MI	A. INU.	
	MR ATHAS		5 MI	• • • • • • • • • • • • • • • • • • •	the steps taken in pursuing that
	Λ It's very reasonable. They can $-$ this is not		7	affect your	opinion on how long the interim
	an uncertainty as to when this rare weather		8	solution ou	ight to have been in place?
	event is going to happen. This is like they		о 9 мі	R ATHAS.	ight to have been in place.
10	are deciding on this solution for an interim	1	0	A. I think that	it's the exact that question
11	basis and they have the ability in concert	1	1	is answere	d in my opinion that they have
12	with the Board approving their investments to	12	2	control ove	er the interim period, so it doesn't
13	end the interim period. You know, whether	1.	3	so it's no	ot relevant.
14	it's the CT, whether it's something else, you	14	4 MI	R. O'BRIEN:	
15	know, they could end it.	1:	5	Q. And I thinl	that's where I was going. They do
16	MR. O'BRIEN:	1	6	have control	ol over the interim period. So once
17	Q. Okay.	1'	7	they make	that decision, the utility has the
18	MR. ATHAS:	1	8	control ove	er when to end that interim period.
19	A. So it's it sounds like what you're	19	9 MI	R. ATHAS:	
20	suggesting is was it should was it	20	0	A. Yeah.	
21	careless because they were because they	2	1 MI	R. O'BRIEN:	
22	didn't have absolute certainty of an	22	2	Q. Okay. Yo	u had made some comments just in
23	implementation that would end the interim	2	3	terms of th	e likelihood of a scenario where
24	period.	24	4	black start	might have been at Holyrood
25	MR. O'BRIEN:	2	5	might have	been necessary. Were you aware

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1 that there was a situation back in '94 when	A. It's an im	provement. Can we leave it at that,
2 all transmission lines going into Holyrood	2 that it's a	n improvement?
3 were out?	3 MR. O'BRIEN:	
4 MR. DIDOMENICO:	4 Q. Okay. Ir	terms of that knowledge that the
5 A. I was.	5 transmiss	ion lines had been down back in '94,
6 MR. O'BRIEN:	6 is that sor	nething that so this is not just
7 Q. You were aware of that, okay.	7 a hypothe	tical now that Hydro is looking at.
8 MR. DIDOMENICO:	8 This is so	mething that has actually happened
9 A. Yes. Can I -	9 before. Is	s that does that enter into your
10 MR. O'BRIEN:	10 mind set	as to whether or not it was
11 Q. Yeah, sure.	11 reasonabl	e to take significant steps to have
12 MR. DIDOMENICO:	12 black star	t on site?
13 A. Can I qualify one thing? You said that black	13 MR. DIDOMENI	CO:
14 start was necessary. Black start would be	14 A. We were	aware of that and again, it tends to
15 advantageous, not necessary, but advantageou	s. 15 point to	the unlikelihood of that event
16 MR. O'BRIEN:	16 occurring	. It did occur, but it occurred two
17 Q. Okay. And just explain that in terms -	17 times or t	hree times, gone back and forth two
18 MR. DIDOMENICO:	18 or three ti	mes, over the recorded history of
19 A. I just want to qualify -	19 the manag	gement team that was in place. You
20 MR. O'BRIEN:	20 know, two	o times in a 25 or whatever, 30 year
21 Q. But explain that to me. I'd give you that	21 period of	time needs to be measured. It's not
22 opportunity.	22 that's n	ot suggesting to me that it's going
23 MR. DIDOMENICO:	23 to happen	every year or it's going to happen -
A. Well, again, as we've discussed multiple	24 - you kno	w what I'm saying?
times, one of the biggest benefits is pre-	25 MR. O'BRIEN:	
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1 warming.	1 Q. Yeah, but	t it's still something you have to
2 MR. O'BRIEN:	2 plan for.	
3 Q. Right.	3 MR. DIDOMENI	CO:
4 MR. DIDOMENICO:	4 A. The risk a	associated with it is less than you
5 A. So that's an advantage to that scenario. It's	5 might thin	nk.
6 not a must. It's not that's what I'm	6 MR. O'BRIEN:	
7 trying to -	7 Q. But it's st	ill something, as you've indicated
8 MR. O'BRIEN:	8 to Ms. Gr	eene, that a utility has to plan for?
9 Q. No, you can wait until the transmission lines	9 MR. DIDOMENI	CO:
10 are -	10 A. Yes.	
11 MR. DIDOMENICO:	11 MR. ATHAS:	
12 A. In other words, the lights are not going to	12 A. They hav	e to consider.
13stay out unless if you didn't have black start	13 MR. O'BRIEN:	
14 at that facility. That's all I'm trying to	14 Q. They hav	e to consider?
15 communicate.	15 MR. DIDOMENI	CO:
16 MR. O'BRIEN:	16 A. Absolute	y.
17 Q. No, I understand that.	17 MR. O'BRIEN:	
18 MR. DIDOMENICO:	18 Q. But they	don't have to plan for?
19 A. That's my distinction between necessary and a	an 19 MR. ATHAS:	
20 improvement.	20 A. Well, the	re's a sometimes the word "plan"
21 MR. O'BRIEN:	21 is used w	ith the implication that to plan for
22 Q. I understand that. But you would agree it is	22 or consid	ler means you end up making an
a significant improvement to be able to warm	23 investmen	nt and that's not how I would use it
24 the generators?	as a plan.	That's why I went to the other
25 MR. DIDOMENICO:	25 word "con	nsider". If you they considered

	Page 217		Page 219
1	that there was a slight decrease in	1	MR. DIDOMENICO:
2	reliability associated with the interim	2	A. You know, that's fundamental throughout our
3	solution versus so, interim solutions that	3	report and we talk about engineering judgment
4	would have in some way put black start	4	as to what's going on. That's a judgment
5	generation there sooner, okay. So that's	5	call. I can't give you a number.
6	so in that case, that's they plan for it.	6	MR. O'BRIEN:
7	I mean, when you plan for when you plan as	7	Q. Okay.
8	a distribution company to restore the system.	8	MR. DIDOMENICO:
9	when you plan for outages, you're not planning	9	A. All I can tell you is it's a judgment call
10	to avoid them by under grounding everything.	10	based on all the factors that are surrounding
11	You're planning what to do about them and	11	the situation.
12	stuff So it's just a different it's a	12	MR ATHAS
13	different animal than plan means invest. One	13	A And outside of coming in whether it's for a
14	answer as Phil said is the simple answer	14	month or whether it's for a year is not going
15	is to invest you know, and just throw money	15	to get to the level of understanding of the
15	after every problem get more metal on the	15	system and all its particular nuances and the
10	ground put things more generation at	10	like and the weather and everything also that
$\begin{bmatrix} 1 \\ 1 \\ 1 \\ 0 \end{bmatrix}$	substation every place you want to go and	1 / 1 0	goes into that needs to go into that
$\begin{bmatrix} 10\\10 \end{bmatrix}$	substation, every place you wall to go allu	10	iudament and some of that is judament that
19	that you could possibly think of and then	19	gate integrated into the brain in some way
$ _{21}^{20}$	some But that's not planning. That's one	20	shape or form to make that informed decision
$\begin{vmatrix} 21\\ 22 \end{vmatrix}$	some. But that s not plaining. That s one	21	shape of form to make that morned decision
$\begin{vmatrix} 22\\ 22 \end{vmatrix}$	that's fine. But planning an also mean that	22	So I mean as that's that's why we can use
23	that's line. But plaining can also mean that	23	So, I mean, so that s that s why we can use
24	you that sit s reasonable to take some	24	the word reasonable is that the process of
25	exposure.	25	relying on skilled people with knowledge of
	Page 218		Page 220
1	MR. O'BRIEN:	1	the system and the like to make a reasonable
2	Q. And in this particular case though, planning	2	decision is what the very basis of our report
3	was going to involve investing at some point.	3	is.
4	MR. ATHAS:	4	MR. O'BRIEN:
5	A. Yes, at some point.	5	Q. Okay. I wonder, Mr. Chair, I don't have too
6	MR. O'BRIEN:	6	much more, but I think I could pare it down
7	Q. Yeah, okay. And when you say taking the	7	fairly well overnight, if we could break here.
8	significant risk, it was going to be taking	8	CHAIRMAN:
9	sorry, I shouldn't say significant, taking a	9	Q. Good.
10	risk, it was involving a risk that had already	10	ADJOURNED AT 1:24 P.M.
11	come about and Hydro had already seen had		
12	happened before where transmission was out?		
13	MR. DIDOMENICO:		
14	A. That the peninsula was isolated from the rest		
15	of the grid, yes.		
16	MR. O'BRIEN:		
17	Q. Yeah, so it's not a hypothetical risk in that		
18	context?		
19	MR. DIDOMENICO:		
20	A. No. No, not in that context. It's a		
21	possibility that it might occur, but it's very		
22	low possibility.		
23	MR. O'BRIEN:		
24	Q. Okay. And how much of a risk is necessary		
	-		

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25

before you would think steps had to be taken?

November 2, 2015

NL Hydro GRA

November 2, 2015	Multi-Page TM	NL Hydro GRA
 CERTIFICATE I, Judy Moss, hereby certify that the foregoin and correct transcript of a hearing in the mathematical end of the composition of the and and Labrador Hydro's Generation of the Commissioners of the Public Utili St. John's, Newfoundland and Labrador and by me to the best of my ability by means of apparatus. Dated at St. John's, Newfoundland and Labrador this 2nd day of November, A.D., 2015 Judy Moss 	g is a true atter of eneral Rate ber, A.D., 2015 ties Board, was transcribed f a sound ador	

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