

1 Q. **C-80, Volume I: Replace Power Transformers**

2 Please confirm that the justification for the replacement of the Oxen Pond
3 transformer is failure of the transformer, not a Degree of Polymerization of
4 cellulose insulation paper less than 400 or a poor dissolved gas analysis.

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7 A. It is confirmed that the justification for the replacement of Oxen Pond Grounding
8 Transformer, GT1, is the failure of the transformer. Replacement is not required as
9 a result of testing that shows that the cellulose insulation Degree of Polymerization
10 is less than 400, or the insulating oil testing shows poor dissolved gas analysis.