Operation in the rough zone has been noted as a contributing cause of the weld failures and has 1 Q. 2 caused Hydro to implement procedures that limit the operation of units 1 and 2. Hydro states 3 that the proposed replacement of the 17' diameter penstock will remove the operating 4 restrictions.

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- a) Does Hydro propose to operate the units in the rough zone other than when passing through the zone while the unit is being powered to its desired level of output outside of the rough zone?
- b) If not, does that mean that even with the replacement of the 17' diameter penstock the units would continue to operate as they do now?

- A) a) No, Newfoundland and Labrador Hydro's ("Hydro") standard method of unit operation limits operation in the rough zone to migration to the desired megawatt output level.
 - b) Hydro intends to return to its standard operating procedures with respect to the rough zone when the replacement of the 17-foot diameter section is complete. The standard operating procedure does not allow operation in the rough zone but permits migration through the rough zone to the desired generational output setting with no base load constraints. The current operating restrictions further decrease rough zone operation by limiting the amount of time the units spend travelling through the rough zone. This is achieved by minimizing the shutdowns and start-ups on Units 1 and 2 and by base loading the units above the rough zone.