

1 **Q. The MGT, according to the filed evidence, has the capability to provide power to an**
2 **area of the system that has sustained severe damage where it is expected to take**
3 **more than forty-eight hours to repair the damage.**

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5 **(a) The MGT takes 48 hours to dismantle, transport, reassemble, and prepare for**
6 **generation. Please particularize every instance over the past ten years in which**
7 **the MGT has been used to support customer outages, the location, duration of**
8 **the use, and the year.**

9
10 **(b) Please list the locations where the MGT has been stored and the periods of time**
11 **the MGT has been stored in each of these locations over the last five years.**

12
13 **A.** The Company uses its mobile generating units to avoid customer outages in two primary
14 scenarios: (i) during planned outages required to complete construction and maintenance
15 projects; and (ii) during unplanned outages as a result of system failure due to storm
16 events or other factors affecting reliability.

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18 **(a)** Table 1 lists each time the MGT has been used to avoid customer outages for the past
19 10 years, including the location and the number of days during which an outage was
20 avoided.

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Table 1
MGT Operations
2007 to 2017 YTD

Date	Location	Number of Days¹
July 2007	Port aux Basques	1
August 2007	Port aux Basques	1
July 2008	Twillingate	6
August 2008 – September 2008	Abraham's Cove	9
August 2008	Wesleyville	4
October 2008	Port aux Basques	3
November 2008	Bell Island	4
December 2008	Fermeuse	4
March 2009	Port aux Basques	1
June 2009	Port aux Basques	1
August 2009	Robinsons	2
August 2009	Port aux Basques	3
March 2010	Catalina	3
March 2010	Old Perlican	5

¹ "Number of Days" indicates those days on which the operation of the MGT avoided customer outages. Not included are days on which the MGT operated for system support at the request of Newfoundland and Labrador Hydro ("Hydro"). During such events, the MGT operates to provide additional reserve on the Island Interconnected System. As such, the Company does not consider operation of the MGT for system support as avoiding customer outages.

Table 1
(continued)
MGT Operations
2007 to 2017 YTD

Date	Location	Number of Days
March 2010	Bonavista	1
April 2010	Bonavista	1
May 2010	Bonavista	1
October 2010	Port aux Basques	3
July 2011	Port aux Basques	3
February 2012	Port aux Basques	3
April 2012	Bell Island	1
July 2012	Bell Island	1
July 2012	Port aux Basques	1
August 2012	Port aux Basques	1
August 2012	Baie Verte	6
November 2012	Port aux Basques	1
June 2013	Port aux Basques	1
July 2013	Port aux Basques	3
August 2013	Port aux Basques	2
August 2013	Bonavista	2
January 2014 ²	Holyrood TGS ³	9
August 2014	Port aux Basques	5
October 2014	Bell Island	2
May 2015	Trepassey	6
June 2015	Abraham's Cove	15
July 2015	Twillingate	2
August 2015	Twillingate	2
September 2015	Twillingate	2
September 2015	Port aux Basques	2
September 2016	Torbay	2
October 2016	Torbay	2
January 2017	Port aux Basques	2
July 2017	Port aux Basques	3

- 1 (b) The MGT is never *stored* for periods of time. When not deployed for planned or
 2 unplanned outages, the MGT is located at a Company substation or facility and
 3 routinely tested to ensure its readiness for service and ability to provide system
 4 support, if required. This does not include periods when the MGT is undergoing
 5 maintenance at a third-party facility.

² During the period known as DarkNL, the Island Interconnected System was operating with almost no reserve. Therefore, the 6 MW of generation provided by the MGT reduced the number of customers experiencing rotating outages.

³ "Holyrood TGS" indicates the Holyrood Thermal Generating Station.

1 The existing MGT has historically been stationed at the Grand Bay Substation in Port
2 aux Basques during the winter months. Customers in the Port aux Basques area are
3 served by 2 radial transmission lines: Hydro's TL214 and TL215.⁴ Stationing the
4 MGT in this area helps minimize the risk of outages to customers supplied by these
5 transmission lines.

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7 Most recently, the MGT has been stationed on the Avalon Peninsula during the winter
8 months. For portions of the 2012-13 and 2013-14 winter seasons, prior to the
9 installation of the black start diesel generators at Hydro's Holyrood TGS, the MGT
10 was stationed at Holyrood to support station service requirements. The MGT was
11 then stationed at Whitbourne during the winters of 2014-15 and 2015-16. Stationing
12 the MGT at Whitbourne ensured the unit was: (i) centrally located for emergency
13 dispatch, if required; and (ii) able to provide system support on the Avalon Peninsula,
14 if required. In December 2016, the MGT returned to Port aux Basques to provide
15 generation support following the loss of a single turbine at the Rose Blanche
16 Hydroelectric Plant.

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18 Table 2 lists the periods of time the MGT has been stationed at various standby
19 locations over the past five years, as well as instances during which the unit was out
20 of service.

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Table 2
MGT Standby Locations
2012 to 2017 YTD

Start Date	End Date	Location
January 2012	June 2012	Bell Island
July 2012	August 2012	Port aux Basques
September 2012	January 2013	Port aux Basques
January 2013	June 2013	Holyrood TGS
December 2013	March 2014	Holyrood TGS
March 2014	June 2014	Out of Service
July 2014	September 2014	Port aux Basques
October 2014	April 2015	Whitbourne
October 2015	August 2016	Whitbourne
November 2016	December 2016	Whitbourne
December 2017	July 2017	Port aux Basques

⁴ Transmission line TL214 runs through the Codroy Valley to Doyle's Substation. Transmission line TL215 extends from Doyle's Substation to Grand Bay Substation.