

- 1 **Q:** In Liberty’s opinion, does the June 2009 report undertaken by Ernest Orlando
2 Lawrence Berkeley National Laboratory entitled “*Estimated Value of Service*
3 *Reliability for Electric Utility Customers in the United States*” prepared for the
4 U.S. Department of Energy (see website: [http://certs.lbl.gov/pdf/lbnl-](http://certs.lbl.gov/pdf/lbnl-2132e.pdf)
5 [2132e.pdf](http://certs.lbl.gov/pdf/lbnl-2132e.pdf)) provide a reasonable basis for Hydro to conduct a similar study
6 specific to electricity consumers of this Province? Would this provide useful
7 information in addressing your statement (Liberty’s Interim Report, page ES-
8 2): “*Liberty believes it is time to reassess the service reliability and cost balances*
9 *that underlie the decisions on what level of supply resources to make available*”?
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12 **A.** The dollar cost (and savings) for a utility to avoid a customer interruption or
13 customer minutes of interruption can often be realistically estimated for developing
14 and budgeting generation, transmission, and reliability activities. What cannot be
15 determined objectively, however, is the value to place on an interruption to the
16 average customer in all the affected classes. Studies like the one referenced have
17 value in informing judgment, but Liberty has seen no way to make that judgment
18 anything other than a subjective one, albeit informed by as much objective data as
19 is available. Liberty does not consider the application of attention and resources to
20 such a study a priority for Hydro.