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On page 11, Liberty references " ... new criteria [for reliability] more consistent **O**: 2 with North American practice ... " Please confirm a level of LOLH and/or EUE that would be consistent with North American practice, and confirm if this criteria would be equivalent to one failure every ten years.

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Please see response to IC-PUB-001. A.

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The conversion of an LOLE to a loss of load hours (LOLH) or expected unserved energy (EUE) is not straightforward. The LOLE addresses the likelihood of an interruption, but does not consider the duration of that interruption. On the other hand, the LOLH considers the aggregate hours of interruptions and not the number of interruptions. Those familiar with distribution reliability will note the similarity to SAIFI and SAIDI respectively.

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Without making some assumptions regarding outage durations, one cannot equate the various parameters. The paper referenced in our response to IC-PUB-001 simplistically assumes an outage duration of 24 hours, which would convert the .1 LOLE to 2.4 LOLH. Hydro's calculations are more rigorous and its model translates its LOLE of .2 (one on five years) to an LOLH of 2.8. Hydro further indicates that its model suggests that this LOLE and LOLH equates to 300 MWh EUE per year.

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On a simple pro-rated approximation basis, assuming Hydro shifted its LOLE to one in ten years from the current one in five, one would expect Hydro's new standards to be about 1.4 LOLH and 150 EUE, but this would be subject to Hydro's then-current modeling assumptions.