

1 **Q: Reference: *Review of Newfoundland and Labrador Hydro Power Supply***
2 ***Adequacy and Reliability Prior to and Post Muskrat Falls Final Report, Page 41.***

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4 *"We have nevertheless reviewed all the information provided and discussed the*
5 *matter with project personnel. Our interest is primarily on reliability and how the*
6 *OHL integrity might affect bipole reliability and the impact of OHL-related bipole*
7 *outages ...*

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9 *Hydro's position is that it has adequately designed towers and other components*
10 *accordingly. We do not provide an opinion on the adequacy of the OHL design,*
11 *however, we discuss the prospects for multiple tower failures, their impacts and*
12 *associated restoration challenges in the appropriate sections of this report. "*

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14 **Since the impacts of bipole losses due to icing and wind on line reliability have**
15 **been assessed to be very important by Liberty, is it reasonable for Liberty to**
16 **rely only on Hydro's statement that Hydro had "adequately designed towers**
17 **and other components accordingly"?**

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20 **A.** No, it is not reasonable for Liberty, or anyone else, to "rely only on Hydro's
21 statement that Hydro had 'adequately designed towers and other components
22 accordingly'". In fact, Liberty has not relied on Hydro's statements in this regard.
23 Liberty stated, at Page 41 of our report, that "we have not provided an opinion on the
24 adequacy of the OHL design". Also on Page 41, we note that "*a technical*
25 *assessment of the structural adequacy of the OHL is outside the scope of Liberty's*
26 *engagement by the Board for this report.*"