

1 **Q. Provide details of consequences of deferring the Rattling Brook Refurbishment**
2 **project for 1, 2, 3, 4, or 5 years?**
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4 A. For each year the Rattling Brook Refurbishment project is deferred, probability of plant
5 failure increases. Plant failure, in turn, would result in (i) increased capital costs due to
6 unplanned plant replacement and (ii) loss of plant availability resulting in increased
7 energy costs.
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9 Deferral of the Rattling Brook Refurbishment project also has operating and potential
10 public safety consequences which are outlined in the Response to PUB-3.0 NP.
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12 It is Newfoundland Power's position that deferral of the Rattling Brook Refurbishment
13 project beyond 2007 will threaten Newfoundland Power's ability to provide least-cost
14 energy safely to its customers.