

1 Q. Please provide the certification or other documentation showing that ProEnergy
2 Services LLC had clear title of ownership to this CTG package when tenders closed
3 on April 21, 2014.

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6 A. Pro Energy Services LLC did not have clear title of ownership to the CT package at
7 the time that tenders closed. Hydro relies upon the bonding protection provided
8 under its contracts to protect it from any adverse claims that may arise with regard
9 to equipment supplies.