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IV. REED

...

Interrogatory (No. PHS-MLP-17-39): At Page 106, lines 12 to 13, of his reply testimony, Mr. Reed testifies that Plant 2A “has enhanced the reliability of customers’ electric service.” In this regard:

(a) Describe in detail what aspects of ML&P’s reliability Mr. Reed believes have been improved by Plant 2A, and the basis for that belief.

(b) Identify any documents supporting your response to (a).

Response: (a) Mr. Reed believes that the aspect of reliability that is improved is the probability that an unplanned outage of a generator will cause a service interruption for

MUNICIPAL LIGHT AND POWER’S INITIAL RESPONSE TO PHS’ SEVENTEENTH REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-17)

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1 ML&P's customers. The basis of that belief is Mr. Reed's experience in the utility industry and
2 the fact that the replacement of aging generation assets with a new, modern asset, particularly
3 one that has the ability to quickly bring a spare turbine into service in the event of a problem (as
4 ML&P Witness Eugene Ori describes occurred in December 2016 at pages 26-27 of his Reply
5 Testimony), will reduce the probability of an unplanned outage.

6 (b) Reply Testimony of Eugene Ori.

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8 **Person(s) Supplying Information:** John Reed.

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25 MUNICIPAL LIGHT AND POWER'S INITIAL RESPONSE TO PHS' SEVENTEENTH
26 REQUEST FOR DISCOVERY ON REPLY TESTIMONY (PHS-MLP-17)

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