

MR. ROGERS, EXAM. BY MR. MERRICK

1 information; I appreciate that.

2 A. The sentence below the examples, I think, makes
3 clear that they had factored those risks into their, they
4 say, "calculations based on an anticipated level of
5 problems that may develop." It means they had catered
6 for these kinds of issues in the business plan. That's
7 what I was seeking assurance on.

8 Q. All right.

9 COMMISSIONER Just one point of clarification. What
10 would he mean by "infantile mortality on new equipment"?

11 A. My understanding is that this is -- that you have
12 new equipment that just prematurely wears out.

13 MR. MERRICK In its --

14 A. And --

15 Q. -- infancy, in effect?

16 A. Beg your pardon?

17 Q. In its infancy --

18 A. Yes.

19 Q. -- in effect?

20 A. In the early -- excuse me, that's quite right. In
21 the early days of its use, days or weeks after it's put
22 into operation, you have unforeseen failure of some kind
23 on the equipment. And I gather that would -- it would
24 create a number of surprises operationally that you are
25 not expecting that would have to be catered to. That's