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Q.	Depreciation
	Exhibit 11, page 20 of 628. Regarding Account C13, please confirm that the
	application of a 60-R3 Iowa curve would result in less than 80 percent surviving
	after age 45, and that the account shows 93.4 percent surviving (Exhibit 11, page
	111 of 628). Please provide the Iowa curve that meets the least squares best fit
	along with an updated page 109 of 628.
Α.	This response has been provided by Concentric Advisors (Concentric).
	Confirmed. Concentric uses a Residual Measure (RM) which is the square root of
	the sum of the square differences. The smallest Residual Measure is 0.71 for an
	Iowa 180-L0.5. Concentric views that strict reliance on a mathematical fit can
	produce unrealistic results as detailed here. An Iowa 180-L0.5 would produce a
	maximum life of 743 years with approximately 25% of retirements occurring from
	ages 0-100, 35% from ages 100-200, 25% from ages 200-300, and the remaining
	retirements from ages 300 to the maximum age of 743 years. Concentric views this
	retirement pattern as an unrealistic expectation. Concentric's life parameter
	recommendation process is to consider mathematical analyses, visual analyses,
	peer comparators, company expectations, and to merge all this input with the
	experience of Concentric for its final recommendations. For this account,
	Concentric views that it's recommended Iowa 60-R3 considers all of these inputs
	and is a more realistic expectation. Please refer to IC-NLH-040, Attachment 1.

## NEWFOUNDLAND AND LABRADOR HYDRO ACCOUNT C13 - CONDUCTOR ORIGINAL AND SMOOTH SURVIVOR CURVES

