

1 Q. Re: PUB/NLH-094: Please provide a comparable list showing all utilities Concentric
2 Advisors is aware of that use the ASL (or equivalent) procedure.

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5 A. This response has been provided by Concentric Advisors (Concentric).

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7 As indicated in Hydro's response to PUB-NLH-094, Concentric does not claim to
8 have a detailed knowledge of all the depreciation practices of all the regulated
9 North American Utilities. However, as the issue of conversion to the Equal Life
10 Group (ELG) Procedure has often been the topic of depreciation industry
11 conference presentations (such as the Society of Depreciation Professionals, the
12 Accounting Sub-Committee of the American Gas Association, and Edison Electric
13 Institute), the list as attached to Hydro's response to PUB-NLH-094 was known to
14 Concentric. As noted in the original responses, the listing of regulated utilities using
15 the ELG procedure, as filed, cannot be considered as fully exhaustive but rather is
16 based on the knowledge of Concentric at this time.

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18 Concentric advises that regulated utilities not using the ELG procedure are likely
19 using the Average Service Life (ASL), or similar, grouping procedure in the
20 depreciation studies filed with their regulator. However, Concentric is aware of the
21 following companies that follow a unit based depreciation approach that would
22 result in depreciation expense more aligned with the ELG procedure:

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- BC Hydro;

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- SaskPower; and

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- Ontario Power Generation.