1 Q. [ELG] - Please state whether the actual retirement pattern exhibited by the 2 Company's historical data for each account precisely follows the assumed annual 3 retirement patterns reflected in the ELG calculation procedure. To the extent the 4 Company believes that the historical retirements in fact followed a precise ELG-5 based pattern, provide the actual expected retirements based on ELG parameters 6 reflected in the existing rates from the time the existing rates went into effect 7 through the current time period in comparison to the actual retirement activity that 8 occurred by vintage for each year for each account or subaccount during the same 9 period of time.

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11 A. Inherent in the application of standardized survivor curves (such as Iowa curves) used to calculate depreciation expense, calculated accrued depreciation and remaining lives is the assumption that retirements will occur in the future with the same dispersion as specified by the survivor curve. Such an assumption is necessary for depreciation calculations independent of the calculation procedure used.