**IN THE MATTER OF** the *Electrical Power Control Act*, RSNL, 1994, Chapter E-5.1 (the EPCA) and the *Public Utilities Act*, RSNL 1990, Chapter P-47 (the Act) as amended, and their subordinate regulations; and

IN THE MATTER OF an Application by Newfoundland and Labrador Hydro, pursuant to section 68 of the Act, for the approval of changes in depreciation methodology and asset service lives.

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## Requests for Information by The Consumer Advocate

## **CA-NLH-79 to CA-NLH-150**

## March 27, 2012

Exhibit 1 presents various life-curve combinations employed to develop individual

depreciation rates and expense levels. Additional account specific information is 2 3 necessary to understand and support various proposals. 4 5 CA-NLH-79 Re: Account F04: Please provide a detailed explanation of the retirement at 6 7 ages 9.5, 14.5, and 16.5 years for Account F04 – Footings & Foundations as set forth on page IV-73 of Exhibit 1, including but not limited to a detailed description 8 9 of what retired along with corresponding dollars, the events that resulted in the 10 need for retirement at those ages, documents supporting the transaction, etc. Further, fully justify why such events should be considered representative of 11 future expectations for the remaining plant. 12 13 CA-NLH-80 Re: Account F06: Please provide a detailed explanation of the retirement at 14 15 ages 0.5, 4.5, 6.5, 9.5 and 12.5 years for Account F06 -Fuel Systems as set forth on page IV-77 of Exhibit 1, including but not limited to a detailed description 16 of what retired along with corresponding dollars, the events that resulted in the 17 need for retirement at those ages, documents supporting the transaction, etc. 18

1 Further, fully justify why such events should be considered representative of 2 future expectations for the remaining plant. 3 CA-NLH-81 Re: Account G01: Please provide a detailed explanation of the retirement at 4 5 ages 23.5 and 25.5 years for Account G01 –Gas Turbine Systems as set forth on 6 page IV-79 of Exhibit 1, including but not limited to a detailed description of what 7 retired along with corresponding dollars, the events that resulted in the need for 8 retirement at those ages, documents supporting the transaction, etc. Further, 9 fully justify why such events should be considered representative of future 10 expectations for the remaining plant. 11 12 CA-NLH-82 Re: Account G01: Please fully explain and justify the selection of a 35R4 13 life-curve combination for Account G01 - Gas Turbine Systems. The response should specifically address the curve fit set forth on page IV-78 of Exhibit 1 and 14 why a longer life is not appropriate. The response should also present the 15 16 specific steps and corresponding information and documents relied on to arrive 17 at the proposed life-curve combination. 18 CA-NLH-83 19 Re: Account G01: Please provide a detailed description of the various assets and corresponding cost of each set forth in Account G01 – Gas Turbine Systems, 20 21 including all information and documentation the Company believes is significant or meaningful to the determination of life characteristics. Further, provide the 22 hours of operations by year for each separate system since placed into service 23 24 as well as all life limitations and expectations of the manufacturer for each 25 system. 26 27 CA-NLH-84 Re: Account G02: Please fully explain and justify the selection of an 80R4 life-curve combination for Account G02 – Gates. The response should 28 specifically address the curve fit set forth on page IV-80 of Exhibit 1 and why a 29 longer life is not appropriate. The response should also present the specific steps 30 and corresponding information and documents relied on to arrive at the proposed 31 life-curve combination. Further, provide a detailed description of the various 32 assets and corresponding cost of each asset or major groupings of assets within 33

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the account.

1 2 CA-NLH-85 Re: Account G03: Please provide a detailed explanation of the retirement at age 27.5 years for Account G03 - Generators as set forth on page IV-83 of 3 Exhibit 1, including but not limited to a detailed description of what retired along 4 5 with corresponding dollars, the events that resulted in the need for retirement at that age, documents supporting the transaction, etc. Further, fully justify why 6 7 such event should be considered representative of future expectations for the 8 remaining plant. 9 10 CA-NI H-86 Re: Account G03: Please fully explain and justify the selection of a 60S4 11 life-curve combination for Account G03 – Generators. The response should specifically address the curve fit set forth on page IV-82 of Exhibit 1 and why a 12 13 longer life is not appropriate. The response should also present the specific steps 14 and corresponding information and documents relied on to arrive at the proposed life-curve combination. 15 16 CA-NLH-87 Re: Account G03: Please provide a detailed description of the various assets 17 and corresponding cost of each set forth in Account G03 - Generators, including 18 all information and documentation the Company believes is significant or 19 20 meaningful to the determination of life characteristics. Further, provide the hours of operations by year for each separate system since placed into service 21 as well as all life limitations and expectations of the manufacturer for each 22 23 system. 24 25 CA-NLH-88 Re: Account G06: Please provide a detailed description of the various assets and corresponding cost of each set forth in Account G06 – Govenors, including 26 27 all information and documentation the Company believes is significant or meaningful to the determination of life characteristics. 28 29 Re: Account G06: Please fully explain and justify the selection of a 45S4 CA-NLH-89 30 31 life-curve combination for Account G06 -- Govenors. The response should 32 specifically address the curve fit set forth on page IV-88 of Exhibit 1 and why a

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longer life is not appropriate. The response should also present the specific steps

and corresponding information and documents relied on to arrive at the proposed

life-curve combination.

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CA-NLH-90 Re: Account I03: Please provide a detailed description of the various assets and corresponding cost of each set forth in Account I03 – Insulators, including all information and documentation the Company believes is significant or meaningful to the determination of life characteristics.

CA-NLH-91 Re: Account I03: Please provide a detailed explanation of the retirement at ages 17.5, 20.5, and 21.5 years for Account I03 – Insulators as set forth on page IV-99 of Exhibit 1, including but not limited to a detailed description of what retired along with corresponding dollars, the events that resulted in the need for retirement at those ages, documents supporting the transaction, etc. Further, fully justify why such events should be considered representative of future expectations for the remaining plant.

CA-NLH-92

CA-NLH-93

Re: Account I03: Please provide a detailed narrative specifically explaining the portions of the curve fitting process given greater weight in the selection of a 30L3 life-curve combination for Account I03-Insulators. The narrative should specifically and completely address, explain and justify the deviations between the observed life table and the 30L3 for all areas of deviations, but in particular for the deviations beginning at 16.5 and 25.5 years of age. Further, explain on a step-by-step basis each item of meaningful information that was relied on to determine that the 30L3 was the best representation of the mortality characteristics for this account. Finally, provide all documentation that supports, explains, or justifies the impact that each meaningful item of information had in the selection process.

Re: Account I04: Please provide a detailed description of the various assets and corresponding cost of each set forth in Account I04 – Intake Structures, including all information and documentation the Company believes is significant or meaningful to the determination of life characteristics. Further, provide all reasons and justification, including all documents that support any position that an average service life greater than 100 years is not appropriate.

CA-NLH-94 Re: Account L03: Please provide a detailed explanation of the retirement at 1 age 5.5 years for Account L03 - Land Improvements as set forth on page IV-105 2 3 of Exhibit 1, including but not limited to a detailed description of what retired along with corresponding dollars, the events that resulted in the need for 4 retirement at that age, documents supporting the transaction, etc. Further, fully 5 justify why such event should be considered representative of future expectations 6 for the remaining plant. 7 8 CA-NLH-95 9 Re: Account L03: Please provide a detailed description of the various assets 10 and corresponding cost of each set forth in Account L03 – Land Improvements, 11 including all information and documentation the Company believes is significant 12 or meaningful to the determination of life characteristics. Further, provide all 13 reasons and justification, including all documents that support any position that an average service life greater than 50 years is not appropriate. 14 15 16 CA-NLH-96 Re: Account P03: Please fully explain and justify the selection of a 70R4 17 life-curve combination for Account P03 - Penstock. The response should 18 specifically address the curve fit set forth on page IV-138 of Exhibit 1 (note that page IV-138 presents a 75R4) and why a longer life is not appropriate. The 19 response should also present the specific steps and corresponding information 20 21 and documents relied on to arrive at the proposed life-curve combination. 22 CA-NLH-97 23 Re: Account P03: Please provide a detailed description of the various assets 24 and corresponding cost of each set forth in Account P03 – Penstock, including all information and documentation the Company believes is significant or meaningful 25 26 to the determination of life characteristics. Further, provide all reasons and justification, including all documents that supports any position that an average 27 service life greater than 70 years is not appropriate. 28 29 30 CA-NLH-98 Re: Account P04: Please provide a detailed explanation of the retirement at 31 ages 14.5, 16.5, and 26.5 years for Account P04 - Pole Cribs & Pole Hardware as set forth on page IV-141 of Exhibit 1, including but not limited to a detailed 32 33 description of what retired along with corresponding dollars, the events that

resulted in the need for retirement at those ages, documents supporting the

1		transaction, etc. Further, fully justify why such events should be considered
2		representative of future expectations for the remaining plant.
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4 5	CA-NLH-99	Re: Account P04: Please provide a detailed description of the various assets and corresponding cost of each set forth in Account P04 – Pole Cribs & Pole
6		Hardware, including all information and documentation the Company believes is
7		significant or meaningful to the determination of life characteristics.
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9	CA-NLH-100	Re: Account P05: Please provide a detailed description of the various assets
10		and corresponding cost of each set forth in Account P05 – Pole Structures -
11		Wood, including all information and documentation the Company believes is
12		significant or meaningful to the determination of life characteristics. The
13		information should include the height, type (e.g., pine, redwood, etc.), and
14		chemical treatments along with when the treatments were implemented, if any.
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16	CA-NLH-101	Re: Account P05: Please provide the timing and magnitude of each major
17		reconductoring project undertaken in the past that impacted Account P05 – Pole
18		Structures - Wood.
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20	CA-NLH-102	Re: Account P05: Please provide the timing and magnitude of each inspection
21		program implemented in the past that impacted Account P05 – Pole Structures -
22		Wood. Further, identify the timing, number and corresponding cost of poles
23		retired as a result of each such program.
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25	CA-NLH-103	Re: Account P07: Please provide a detailed description of the various assets
26		and corresponding cost of each set forth in Account P07 – Pole - Wood, including
27		all information and documentation the Company believes is significant or
28		meaningful to the determination of life characteristics. The information should
29		include the height, type (e.g., pine, redwood, etc.), and chemical treatments
30		along with when the treatments were implemented, if any.
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32	CA-NLH-104	Re: Account P07: Please provide the timing and magnitude of each major
33		reconductoring project undertaken in the past that impacted Account P07 - Pole
34		- Wood. Further, identify the timing, number and corresponding cost of poles

1		retired as a result of each such project.
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3	CA-NLH-105	Re: Account P07: Please provide the timing and magnitude of each inspection
4		program implemented in the past that impacted Account P07 – Pole - Wood.
5		Further, identify the timing, number and corresponding cost of poles retired as a
6		result of each such program.
7	CA NULL 100	Do. Account DOZ. Diseas fully emploin and justify the collection of a 4000
8 9	CA-NLH-106	Re: Account P07: Please fully explain and justify the selection of a 40R3 life-curve combination for Account P07 – Pole - Wood. The response should
10		specifically address the curve fit set forth on page IV-146 of Exhibit 1 and why
11		any meaningful consideration was given, if any, to the values beginning at age
12		28.5 years of age. The response should also present the specific steps and
13		corresponding information and documents relied on to arrive at the proposed
14		life-curve combination.
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16	CA-NLH-107	Re: Account P07: Please provide a detailed explanation of the retirement at
17		ages 14.5, and 16.5 years for Account P07 - Poles - Wood as set forth on page
18		IV-147 of Exhibit 1, including but not limited to a detailed description of what
19		retired along with corresponding dollars, the events that resulted in the need for
20		retirement at those ages, documents supporting the transaction, etc. Further,
21		fully justify why such events should be considered representative of future
22		expectations for the remaining plant.
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24	CA-NLH-108	Re: Account P10: Please provide a detailed description of the various assets
25		and corresponding cost of each set forth in Account P10 – Powerhouse,
26		including all information and documentation the Company believes is significant
27		or meaningful to the determination of life characteristics. Further, provide all
28		reasons and justification, including all documents that support any position that
29		an average service life greater than 75 years (e.g., 85 years) is not appropriate.
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31	CA-NLH-109	Re: Account P10: Please fully explain and justify the selection of a 75R3
32		life-curve combination for Account P10 – Powerhouse. The response should
33		specifically address the curve fit set forth on page IV-152 of Exhibit 1 (note that
34		page IV-152 presents an 85R4) and why a longer life is not appropriate. The

1 response should also present the specific steps and corresponding information 2 and documents relied on to arrive at the proposed life-curve combination. 3 CA-NLH-110 Re: Account P12: Please provide a detailed description of the various assets 4 5 and corresponding cost of each set forth in Account P12 – Protective Control& 6 Relay Panels, including all information and documentation the Company believes is significant or meaningful to the determination of life characteristics. Further, 7 provide all reasons and justification, including all documents that supports any 8 9 position that an average service life greater than 30 years (e.g., 35 years) is not 10 appropriate. 11 CA-NLH-111 Re: Account P12: Please fully explain and justify the selection of a 30R3 12 13 life-curve combination for Account P12 – Protective Control & Relay Panels. The response should specifically address the curve fit set forth on page IV-154 of 14 Exhibit 1 and why a longer life is not appropriate. The response should also 15 present the specific steps and corresponding information and documents relied 16 on to arrive at the proposed life-curve combination. 17 18 19 CA-NLH-112 Re: Account R05: Please provide a detailed description of the various assets 20 and corresponding cost of each set forth in Account R05 - Radios - Mobile VHF Base Station, including all information and documentation the Company believes 21 22 is significant or meaningful to the determination of life characteristics. Further, provide all reasons and justification, including all documents that support any 23 position that an average service life greater than 15 years (e.g., 18 or 20 years) 24 25 is not appropriate. 26 CA-NLH-113 Re: Account R05: Please fully explain and justify the selection of a 15R3 27 life-curve combination for Account R05 - Radios - Mobile VHF Base Station. 28 29 The response should specifically address the negative exposures and negative 30 retirement on page IV-165. The response should also present the specific steps and corresponding information and documents relied on to arrive at the proposed 31 life-curve combination. 32 33 CA-NLH-114 Re: Account R12: Please provide a detailed description of the various assets 34

and corresponding cost of each set forth in Account R12 - Right-Of-Ways, 1 2 including all information and documentation the Company believes is significant 3 or meaningful to the determination of life characteristics. Further, provide all reasons and justification, including all documents that support any position that 4 an average service life greater than 55 years (e.g., 65 or 75 years) is not 5 appropriate. Finally, specifically address which of the Right-Of-Ways are 6 7 perpetual and which have a specific expiration date, identifying both the installation date, corresponding cost, and expiration date. 8 9 10 CA-NLH-115 Re: Account R12: Please fully explain and justify the selection of a 55R4 11 life-curve combination for Account R12 - Right-Of-Ways. The response should 12 specifically address the curve fit set forth on page IV-178 of Exhibit 1 and why a 13 longer life is not appropriate. The response should also present the specific steps 14 and corresponding information and documents relied on to arrive at the proposed 15 life-curve combination. 16 17 CA-NLH-116 Re: Account R12: Please provide a detailed explanation of the retirement at age 27.5 years for Account R12 - Right-Of-Ways as set forth on page IV-179 of 18 19 Exhibit 1, including but not limited to a detailed description of what retired along with corresponding dollars, the events that resulted in the need for retirement at 20 21 that age, documents supporting the transaction, etc. Further, fully justify why such event should be considered representative of future expectations for the 22 23 remaining plant. 24 25 CA-NLH-117 Re: Account R13: Please provide a detailed description of the various assets and corresponding cost of each set forth in Account R13 - Roads, including all 26 information and documentation the Company believes is significant or meaningful 27 to the determination of life characteristics. Further, provide all reasons and 28 justification, including all documents that support any position that an average 29 service life greater than 50 years (e.g., 60 or 70 years) is not appropriate. 30 31 CA-NLH-118 Re: Account R13: Please fully explain and justify the selection of a 50R4 32

life-curve combination for Account R13 - Roads. The response should

specifically address the curve fit set forth on page IV-180 of Exhibit 1 and why a

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longer life is not appropriate. The response should also present the specific steps 1 2 and corresponding information and documents relied on to arrive at the proposed 3 life-curve combination. 4 CA-NLH-119 Re: Account R14: Please fully explain and justify the selection of a 5SQ 5 life-curve combination for Account R14 – Routers & LAN. The response should 6 specifically address the vintage surviving balances that exceed 5 years as set 7 forth on page V-92 of Exhibit 1 and why a longer life is not appropriate give the 8 9 number and magnitude of surviving vintages. The response should also present 10 the specific steps and corresponding information and documents relied on to arrive at the proposed life-curve combination. Finally, provide the dollars retired 11 12 with the corresponding vintage year of installation that have occurred for both 2010 and 2011. 13 14 15 CA-NLH-120 Re: Account R14: Please provide a detailed description of the various assets and corresponding cost of each set forth in Account R14 – Routers & LAN, 16 including all information and documentation the Company believes is significant 17 or meaningful to the determination of life characteristics. Further, provide all 18 19 reasons and justification, including all documents that support any position that an average service life greater than 5 years (e.g., 6 or 7 years) is not appropriate. 20 21 CA-NLH-121 Re: Account R15: Please provide a detailed description of the various assets 22 23 and corresponding cost of each set forth in Account R15 - Runner, including all information and documentation the Company believes is significant or meaningful 24 25 to the determination of life characteristics. Further, provide all reasons and justification, including all documents that support any position that an average 26 service life greater than 33 years (e.g., 37 or 40 years) is not appropriate. 27 28 CA-NLH-122 Re: Account R15: Please fully explain and justify the selection of a 33R5 29 life-curve combination for Account R15 – Runner. The response should 30 specifically address the curve fit set forth on page IV-182 of Exhibit 1 and why a 31 longer life is not appropriate. The response should also present the specific steps 32 and corresponding information and documents relied on to arrive at the proposed 33

life-curve combination.

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CA-NLH-123 Re: Account S03: Please fully explain and justify the selection of a 5SQ life-curve combination for Account S03 – Servers. The response should specifically address the vintage surviving balances that exceed 5 years as set forth on page V-97 of Exhibit 1 and why a longer life is not appropriate give the number and magnitude of surviving vintages. The response should also present the specific steps and corresponding information and documents relied on to arrive at the proposed life-curve combination. Finally, provide the dollars retired with the corresponding vintage year of installation that have occurred for both 2010 and 2011.

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> CA-NLH-124 Re: Account S03: Please provide a detailed description of the various assets and corresponding cost of each set forth in Account S03 - Servers, including all information and documentation the Company believes is significant or meaningful to the determination of life characteristics. Further, provide all reasons and justification, including all documents that support any position that an average service life greater than 5 years (e.g., 6 or 7 years) is not appropriate.

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26 27 CA-NLH-125 Re: Account \$05: Please provide a detailed description of the various systems and corresponding cost of each set forth in Account S05 - Software, including all information and documentation the Company believes is significant or meaningful to the determination of life characteristics. The description should include the specific purpose of the system, the vendor, and all current plans to retire the system, if any, along with documentation supporting any plans to retire. Further, provide all reasons and justification, including all documents that support any position that an average service life greater than 7 years (e.g., 10 or 15 years) is not appropriate.

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CA-NLH-126 Re: Account S05: Please fully explain and justify the selection of a 7SQ life-curve combination for Account S05 - Software. The response should specifically address the vintage surviving balances that exceed 7 years as set forth on page V-98 of Exhibit 1 and why a longer life is not appropriate give the number and magnitude of surviving vintages. The response should also present the specific steps and corresponding information and documents relied on to

1 arrive at the proposed life-curve combination. Finally, provide the dollars retired 2 with the corresponding system name and vintage year of installation that have occurred for both 2010 and 2011. 3 4 CA-NLH-127 Re: Account S06: Please provide a detailed description of the various assets 5 6 and corresponding cost of each set forth in Account S06 – Spillway Structures, 7 including all information and documentation the Company believes is significant or meaningful to the determination of life characteristics. Further, provide all 8 9 reasons and justification, including all documents that support any position that an average service life greater than 100 years is not appropriate. 10 11 12 CA-NLH-128 Re: Account S08: Please provide a detailed description of the various assets 13 and corresponding cost of each set forth in Account S08 – Static Excitation 14 System, including all information and documentation the Company believes is significant or meaningful to the determination of life characteristics. Further, 15 provide all reasons and justification, including all documents that support any 16 position that an average service life greater than 32 years (e.g., 35 or 40 years) 17 18 is not appropriate. 19 20 CA-NLH-129 Re: Account S08: Please provide a detailed explanation of the retirement at ages 26.5 through 30.5 years for Account S08 – Static Excitation System as set 21 forth on page IV-194 of Exhibit 1, including but not limited to a detailed 22 description of what retired along with corresponding dollars, the events that 23 24 resulted in the need for retirement at those ages, documents supporting the 25 transaction, etc. Further, fully justify why such events should be considered representative of future expectations for the remaining plant. 26 27 CA-NLH-130 Re: Account S14: Please fully explain and justify the selection of a 20R2 28 life-curve combination for Account S14 – Street Lights. The response should 29 specifically address the curve fit set forth on page IV-206 of Exhibit 1 and why a 30 longer life is not appropriate. The response should also present the specific steps 31 and corresponding information and documents relied on to arrive at the proposed 32

life-curve combination.

CA-NLH-131 Re: Account S16: Please provide a detailed description of the various studies and corresponding cost of each set forth in Account S16 – Studies, including all information and documentation the Company believes is significant or meaningful to the determination of life characteristics. The description should include the specific purpose of the system, who performed the study, and the resulting benefits of the study. Further, provide all reasons and justification, including all documents that support any position that an average service life greater than 5 years (e.g., 7 or 10 years) is not appropriate.

CA-NLH-132 Re: Account T03: Please provide a detailed description of the various assets and corresponding cost of each set forth in Account T03 – Tools & Equipment, including all information and documentation the Company believes is significant or meaningful to the determination of life characteristics. Further, provide all reasons and justification, including all documents that support any position that an average service life greater than 20 years (e.g., 25 or 30 years) is not appropriate.

CA-NLH-133 Re: Account T03: Please fully explain and justify the selection of a 20SQ life-curve combination for Account T03 – Tools & Equipment. The response should specifically address the vintage surviving balances that exceed 20 years as set forth on page V-116 of Exhibit 1 and why a longer life is not appropriate give the number and magnitude of surviving vintages. The response should also specifically address the curve fitting presented on page IV-222 and the identified 35S0.5 presentation. The response should also present the specific steps and corresponding information and documents relied on to arrive at the proposed life-curve combination. Finally, provide the dollars retired with the corresponding vintage year of installation that have occurred for both 2010 and 2011.

CA-NLH-134 Re: Account T04: Please provide a detailed description of the various assets and corresponding cost of each set forth in Account T04 – Towers, including all information and documentation the Company believes is significant or meaningful to the determination of life characteristics. Further, provide all reasons and justification, including all documents that support any position that an average service life greater than 65 years (e.g., 70 or 75 years) is not appropriate.

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CA-NLH-135 Re: Account T04: Please provide the number and height of towers retired by year for the past 10 years for Account T04 - Towers. Further, provide the total number, by height and type, of tower in service as of the end of 2009 and currently. Also, identify what type of inspection program is in place and the year each program began.

CA-NLH-136 Re: Account T05: Please provide a detailed description of the various assets and corresponding cost of each set forth in Account T05 – Transformers, including all information and documentation the Company believes is significant or meaningful to the determination of life characteristics. The description should include the number, voltage, size, date of installation and corresponding cost of each transformer. Further, provide all reasons and justification, including all documents that support any position that an average service life greater than 55 years (e.g., 60 or 65 years) is not appropriate.

CA-NLH-137 Re: Account T05: Please provide a detailed explanation of the retirement at age 14.5 years for Account T05 – Transformers as set forth on page IV-227 of Exhibit 1, including but not limited to a detailed description of what retired along with corresponding dollars, the events that resulted in the need for retirement at those ages, documents supporting the transaction, etc. Further, fully justify why such event should be considered representative of future expectations for the remaining plant.

CA-NLH-138 Re: Account T05: Please provide the number, voltage, size and cost of transformers retired by year for the past 20 years in Account T05 - Transformers.

CA-NLH-139 Re: Account T05: Please fully explain and justify the selection of a 50R3 life-curve combination for Account T05 – Transformers. The response should specifically address the curve fit set forth on page IV-226 of Exhibit 1 and why a longer life is not appropriate. The response should also present the specific steps and corresponding information and documents relied on to arrive at the proposed life-curve combination.

2 and corresponding cost of each set forth in Account T07 - Transformers - Pole 3 Mounted, including all information and documentation the Company believes is significant or meaningful to the determination of life characteristics. The 4 5 description should include the number, voltage, size, date of installation and corresponding cost of each transformer. Further, provide all reasons and 6 7 justification, including all documents that support any position that an average 8 service life greater than 30 years (e.g., 35 or 40 years) is not appropriate. 9 CA-NLH-141 Re: Account T07: Please provide a detailed explanation of the retirement at 10 11 ages 12.5 through 14.5 years for Account T07 - Transformers - Pole Mounted as set forth on page IV-231 of Exhibit 1, including but not limited to a detailed 12 13 description of what retired along with corresponding dollars, the events that resulted in the need for retirement at those ages, documents supporting the 14 15 transaction, etc. Further, fully justify why such events should be considered 16 representative of future expectations for the remaining plant. 17 CA-NLH-142 Re: Account T07: Please provide the number, voltage, size and cost of 18 transformers retired by year for the past 20 years in Account T07 - Transformers 19 - Pole Mounted. 20 21 22 CA-NLH-143 Re: Account T07: Please fully explain and justify the selection of a 30R2 23 life-curve combination for Account T07 - Transformers - Pole Mounted. The response should specifically address the curve fit set forth on page IV-230 of 24 Exhibit 1 and why a longer life is not appropriate. The response should also 25 26 present the specific steps and corresponding information and documents relied on to arrive at the proposed life-curve combination. 27 28 CA-NLH-144 Re: Account T09: Please provide a detailed explanation of the retirement at 29 age 9.5 years for Account T09 – Turbines as set forth on page IV-233 of Exhibit 30 1, including but not limited to a detailed description of what retired along with 31 32 corresponding dollars, the events that resulted in the need for retirement at that 33 age, documents supporting the transaction, etc. Further, fully justify why such

event should be considered representative of future expectations for the

CA-NLH-140 Re: Account T07: Please provide a detailed description of the various assets

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1 remaining plant. 2 CA-NLH-145 Re: Account T09: Please fully explain and justify the selection of a 50R3 3 life-curve combination for Account T09 – Turbines. The response should 4 specifically address the curve fit set forth on page IV-232 of Exhibit 1 and why a 5 longer life is not appropriate. The response should also present the specific steps 6 7 and corresponding information and documents relied on to arrive at the proposed 8 life-curve combination. 9 10 CA-NLH-146 Re: Account T09: Please provide a detailed description of the various assets 11 and corresponding cost of each set forth in Account T09 - Turbines, including all information and documentation the Company believes is significant or meaningful 12 to the determination of life characteristics. Further, provide the hours of 13 operations by year for each separate system since placed into service as well as 14 all life limitations and expectations of the manufacturer for each system. 15 16 CA-NLH-147 Re: Account V04: Please provide a detailed description of the various vehicles 17 and corresponding cost of each set forth in Account V04 – Vehicles – 3/4 Ton and 18 Under, including all information and documentation the Company believes is 19 significant or meaningful to the determination of life characteristics, including but 20 not limited to year of installation, mileage, manufacturer, model, and major 21 22 accessories. The information should be provided on electronic medium in Excel 23 readable format. Further, provide life related polices (e.g., a vehicle is to be retired once it reaches 100,000 Km, etc.), including all documentation of each 24 25 policy. CA-NLH-148 Re: Account V04: Please provide a detailed explanation of the retirement at 27

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age 4.5 years for Account V04 – Vehicles – 3/4 Ton and Under as set forth on page IV-241 of Exhibit 1, including but not limited to a detailed description of what retired along with corresponding dollars, the events that resulted in the need for retirement at that age, documents supporting the transaction, etc. Further, fully justify why such event should be considered representative of future expectations for the remaining plant. Finally, provide the dollars retired with the corresponding vehicle identification and vintage year of installation that have

1		occurred for both 2010 and 2011.
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3	CA-NLH-149	Re: Account W01: Please provide a detailed description of the various assets
4		and corresponding cost of each set forth in Account W01 - Water Regulating
5		Structures, including all information and documentation the Company believes is
6		significant or meaningful to the determination of life characteristics.
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8	CA-NLH-150	Re: Account W01: Please fully explain and justify the selection of a 55S4
9		life-curve combination for Account W01 - Water Regulating Structures. The
10		response should specifically address the curve fit set forth on page IV-248 of
11		Exhibit 1 (note that page IV-248 presents an 80S4) and why a longer life is not
12		appropriate. The response should also present the specific steps and
13		corresponding information and documents relied on to arrive at the proposed
14		life-curve combination.
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19	Dated at St. J	lohn's in the Province of Newfoundland and Labrador, this 27 <sup>th</sup> day of March, 2012
20 21		
22		
23		
24		V V
25		Thomas Johnson
26		Consumer Advocate
27		323 Duckworth Street
28		St. John's, NL A1C 5X4
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