

**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  
Newfoundland Power Inc.**

**To: Patricia Lee  
Witness for the Industrial Customers**

**NP-IC-1 to NP-IC-6**

**October 5, 2012**

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## **Requests for Information**

**NP-IC-1** Please indicate whether Ms. Lee is a professional engineer.

**NP-IC-2** Page 26.

Is it Ms. Lee's evidence that the experience of Avista Utilities where penstocks have been in service for almost 100 years and are just being relined, is typical?

**NP-IC-3** Page 27.

Please provide a summary of any and all evidence to support Ms. Lee's claim that "...it has been shown that penstocks can reasonably be expected to experience a life more than 100 years...".

**NP-IC-4** Exhibit PSL-2.

The majority of the asset groupings reviewed by Ms. Lee have (i) long life expectancies and (ii) little, if any, recorded retirement activity. Please explain in full the statistical significance of the lack of retirement activity in asset groups comprised of a small number of large assets with long life expectancies.

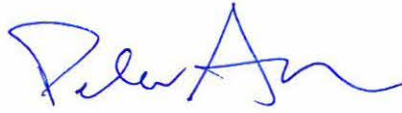
**NP-IC-5** Exhibit PSL-2.

Did Ms. Lee review any accounts other than those for which she recommends adjustments? If so, please provide the results of this review together with full supporting documentation.

**NP-IC-6** Exhibit PSL-2.

Please explain in full why Ms. Lee believes that it is appropriate to recommend adjustments to these 5 accounts without providing the Board a full review which includes Hydro's remaining accounts?

**RESPECTFULLY SUBMITTED** at St. John's, Newfoundland and Labrador, this 5<sup>th</sup> day of October, 2012.



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