Q. [Account D01 - Dams & Dikes] - Please provide all specific support and justification, including all underlying documents corresponding to the statement made in response to CA-NLH-12 Attachment 1 page 4 of 5 under the topic Following Up from April 15 Discussion for Account 179 - Dams, Dikes, Canals, and Tunnels that a recommended 100 average service life is appropriate. Further, explain, support and justify the reference that the 100-year recommended life is appropriate, "especially considering that 100 years is an average age, not a maximum life expectation." The response to this portion of the question should clearly identify the maximum life and how this corresponds or relates to other service lives and maximum lives used for dams and dikes elsewhere in the industry. Finally, provide all meaningful or significant information and supporting documentation for any position taken.

A.

The reference comment from page 4 of 5 of CA-NLH-12 Attachment 1 was provided to summarize the discussions that were held with the Operations staff indicating an expectation based on experience, knowledge of age and current conditions that some assets in this group will last longer than 100 years and some assets will retire prior to 100 years, resulting in an average of 100 years. The discussions with the Operations group and Gannett Fleming did not include any review or discussion of any additional documentation.

The Gannett Fleming study recommends an Iowa 100-R4 curve for account D01. The 100-R4 curve provides for a maximum life indication of 153 years (with less than 1% surviving after the 140th year). The information response to CA-NLH-156 includes Attachment 2 which provides the Iowa curve estimate made by Gannett Fleming within Canada. The maximum life indications of the Iowa curve shapes are published in a number of depreciation textbooks.

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- 1 Mr. Kennedy, during the preparation of the recommendations of the life estimate
- 2 for this account did not review any additional company specific information
- 3 regarding any of the US based Gannett Fleming recommendations.