

1 Q. [Account D01 - Dams & Dikes] - Regarding the statement in response to CA-NLH-75  
2 that newer earthen dams may be expected to have longer lives than those  
3 structures constructed in the 1960s through 1990s, please provide all support,  
4 justification, and corresponding documentation for such statement, as well as the  
5 longer life expectancy associated with such newer construction. Further, provide  
6 the specific review standards employed by other utilities that demonstrate that  
7 Hydro's inspection programs are more or less vigorous than those of other utilities.

8

9

10 A. The statement was based on the broad experience of Mr. Kennedy as gained  
11 through the completion of numerous depreciation studies in many jurisdictions  
12 across Canada. Throughout the completion of these studies, the engineering and  
13 operations staff have consistently indicated that the installation processes used in  
14 the construction of earthen dams has improved over the past 20 years. Mr.  
15 Kennedy did not rely on any specific documentation in providing the opinion.

16

17 With regard to the last portion of the request, seeking the specific review standards  
18 of other utilities, Mr. Kennedy notes that information provided to Gannett Fleming  
19 in the course of completing depreciation studies is under the terms of strict  
20 confidentiality clauses. Gannett Fleming will not disclose the detailed information  
21 as requested as it would cause breach of contracts with other clients. Schedule 2  
22 of the Gannett Fleming report provides the name and year of the peer information  
23 utilized by Gannett Fleming. Gannett Fleming is not aware of all the evidence  
24 entered into the referenced proceeding, but notes that any such information would  
25 be in the public records and available for search by the Consumers Advocate.  
26 Gannett Fleming does not have any additional information in its possession at this  
27 time.