

1 Q. [Account P10 - Powerhouse] - Regarding the statement in CA-NLH-109 that the
2 75R3 Iowa Curve proposed by the Company "anticipates very few retirements
3 through this observation period," please identify the estimated level of retirements
4 that would have occurred in accordance with a 75R3 life-curve combination during
5 this observation period as well as the specific actual level that has occurred.
6 Further, provide the same information for a 90R3 and a 100R3 life-curve
7 combination.

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10 A. The requested analysis was not completed by Gannett Fleming during the conduct
11 of this study. Completion of this request would require a significant amount of
12 detailed calculations. The retirement ratios for each age interval would need to be
13 applied to the remaining investment as at each installation year and then summed
14 to determine the requested amounts. This process would need to be completed for
15 each of the three life curves requested. Notwithstanding the above, Gannett
16 Fleming confirms that both the 90-R3 and the 100-R3 Iowa curves would anticipate
17 very few retirements through the observation period and also would provide for a
18 reasonable fit. Gannett Fleming notes that in the circumstances where no
19 retirement activity has occurred over an observation period, many average service
20 life and Iowa curve shape combinations would provide an equally good fit to the
21 observed life table. For example, a 50-S6 would also provide an equal or better
22 indication of a fit to the observed life table for this account. As such, in the
23 circumstances of no retirement activity, other factors such as peer analysis and
24 views of the internal operational staff become the primary factor in the selection of
25 the average service life estimate.