Q. [Account G03 - Generators] - Please provide all support, justification, and corresponding documentation in support of any opinion or basis that the Company believes its investment in generators is not reasonably represented by a 70S4 life-curve combination in comparison to the Company's proposed 60S4 life-curve combination for Account G03 - Generators.

A.

As indicated in response to CA-NLH-86, the generator windings have been componentized out of this account, resulting in a view that this account's life should be extended from the previously studied 50 years to the recommended 60 years, which represents a 20% life extension. Gannett Fleming provided a plot of both the recommended 60-S4 lowa curve and the 70-S4 against the observed life table as shown in CA-NLH-179 Attachment 1. As indicated in the attachment, the 70-S4 as requested by the Consumer Advocate provides no better fit, and in fact discounts the observed retirement activity at age 27. Furthermore, a life extension to 70 years represents a 40% increase, which is not reasonable, given that the 70-year curve is actually a less precise fit to the life table. If the indications of a life extension requirement continue in future studies, an increase in the average life estimate will be more appropriately made at that time.

