

- 1 Q. [Account R12 - Right of Ways] - Regarding the statement in CA-NLH-116 that
2 operations staff indicated that a 45- to 50-year life would be reasonable for the life
3 associated with Account R12 - Right of Ways, please provide the following:
- 4 a. A detailed narrative explaining and justifying why operations staff believes
5 that only a 45- to 50-year life would be reasonable including all meaningful
6 and significant factors;
- 7 b. All documents which support operations staff's belief that a 45- to 50-year
8 life would be reasonable;
- 9 c. Whether operations staff also believes that a 65-year life, a 70-year life, and
10 a 75-year life would also be reasonable and to the extent each of the noted
11 lives is not considered reasonable, all support and justification and
12 documentation in support of such position including all meaningful and
13 significant factors.
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- 16 A. The operations group were provided a preliminary version of the results of the
17 retirement rate analysis in order to provide comment and to verify the
18 reasonableness of the preliminary estimates. The operations group provided a
19 check of the reasonableness of Gannett's recommendation based on their
20 experience and knowledge of the system and their comments were not based on
21 any specific documentation. The Hydro operations group rely on the professional
22 expertise of Mr. Kennedy in providing Iowa curve fits, and are not in a position to
23 offer comment on the comparability of the characteristics of the differing Iowa
24 curve fits.