Q. [Account R13 -Roads] - Please identify the life estimate for roads reflected in
Gannett Fleming studies in North America during the past 10 years. For each such
estimate, identify the utility and the date of the study as well as the corresponding
account pertaining to the investment at issue.

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Please refer to CA-NLH-156 Attachments 1 and 2. Attachment 1 is a summary of average service life parameters for U.S. based electric utilities where depreciation studies were conducted by Gannett Fleming (with FERC 336 for roads related to Hydro Generation and FERC 359 for roads related to Electric Transmission). Attachment 2 provides a summary of average service life parameters by account structure for Canadian based electric utilities (in which "Roads, Railways and Bridges" related to Hydro facilities and "Road and Trails" related to Transmission facilities are specifically identified). In providing these attachments, Gannett Fleming is identifying the companies for which the statistics were developed. However, as not all of the studies are in the public domain, Gannett Fleming cannot identify the specific companies for which the specific statistics apply. As such, the companies for which the studies have been performed are listed separately from the actual identification of service life estimates. Other than for the utilities as listed in Schedule 2 of the Gannett Fleming report, Mr. Kennedy did not have any additional information regarding the utilities at the time the Hydro study was completed. Furthermore, Mr. Kennedy does not have any additional information regarding the utilities listed in CA-NLH-156 Attachment 1. The depreciation studies completed on behalf of the U.S. based utilities were completed in the firm's three American based offices by other Gannett Fleming analysts.