

1 Q. [Curve Fitting] - Please identify and support the criteria for and the specific weight
2 assigned to the tail or end of a survivor curve in a curve fitting process that
3 recognizes maximum life considerations. Further, specifically respond to the issues
4 as it applies to accounts D01-Dams, F04-Footings, P10-Powerhouses, and R12-Right-
5 Of-Ways.

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8 A. When reviewing the average service life characteristics for a group of plant, the
9 overall pattern of the expected mortality of the plant should be considered. Mr.
10 Kennedy acknowledges that the tail end of the smoothed Iowa curve often
11 represents the retirement characteristics of only a small percentage of the
12 investment in the plant being studied. However, even though it represents only a
13 small percentage of the investment, it is also an indication that a small amount of
14 investment is expected to be surviving at the indicated long life intervals. As such,
15 it is important to consider, that when estimating the average service life
16 characteristics, that the Iowa curve tail is providing some meaningful information.

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18 In the circumstance of the four accounts specifically identified in this question, the
19 percentage surviving as at the oldest age interval is at least 87 percent. As such,
20 virtually the entire pattern of expected future retirements is estimated. Mr.
21 Kennedy believes that in these circumstances the entire future pattern of the Iowa
22 curves becomes an important consideration in the selection of the curve, including
23 the plant that would be expected to live to or nearly to the maximum life indication.
24 It is through the consideration of the maximum life indication that the analyst can
25 test the reliance on the professional judgment that is required to determine the
26 overall smoothed curve shape.