

1 Q. [P10-Powerhouses] Please fully explain and justify why powerhouses in Account P10
2 are expected to have average service lives 25 years shorter than the investment in
3 Account D01-Dams, including any claim that powerhouse not integrated in with the
4 dam structure are different than those integrated into the structure. Provide all
5 workpapers, assumptions, considerations and material reviewed and relied on in
6 sufficient detail to permit verification of the response.

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9 A. The physical configuration of most of the Hydro powerhouses is that they are
10 physically separate structures and are not integrated into the dam structure. It is
11 the experience of Mr. Kennedy that in these circumstances, the powerhouses are
12 subjected to increased amounts of renovations to accommodate changes in the
13 generator units or subsidiary equipment. Additionally, the physical relocation of
14 the powerhouse is more feasible in the circumstances where the powerhouse is not
15 integrated into the actual dam structure.

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17 The dams are constructed and maintained in a manner that they are expected to
18 have a very long life. Also, replacing or rebuilding a dam can often be cost
19 prohibitive and present significant environmental challenges. In contrast, the re-
20 location or renovation of a powerhouse can often result from increases in required
21 capacity, changes in technology or due to structural issues caused by age and
22 condition. Mr. Kennedy notes, that while limited, the powerhouse account P-10
23 has witnessed some retirement activity over the period from 1991 to 2009. In
24 contrast the account D01 – Dams, Dykes, Canals and Tunnels has experienced no
25 retirement actively over this same period.