

1 **NLH-IC-31 NLH-IC-31 At page 30 of the evidence of Ms. Lee, Ms. Lee states that the**  
2 **life of a concrete or steel powerhouse should be expected to live far longer**  
3 **that a brick structure. Ms. Lee further suggests that given proper**  
4 **construction and maintenance, brick powerhouses are expected to**  
5 **experience lives in the range of 50 years to 75 years. With regard to these**  
6 **statements please provide the following:**

7 **(a) All documentation and support relied upon by Ms. Lee in providing**  
8 **the opinion that concrete or steel powerhouses should be expected**  
9 **to live longer than brick powerhouses.**

10 **(b) Specifically identify what building practices would be considered as**  
11 **“proper construction”.**

12 **(c) Specifically identify what maintenance practice would be considered**  
13 **as proper maintenance”.**

14 **RESPONSE:**

15 **(a) Ms. Lee did not rely on any specific documentation or support for the**  
16 **opinion that concrete or steel powerhouses should be expected to live**  
17 **longer than brick powerhouses. Rather, Ms. Lee relied on the over 30**  
18 **years of experience in reviewing and analyzing major structures of**  
19 **regulated companies in Florida.**

20 **(b) The term “proper construction” means, at a minimum, in accord with any**  
21 **governing regulations and best practices.**

1           (c)    The term “proper maintenance” relates but is not limited to maintenance  
2                   practices and standards recommended by the industry, internally adopted  
3                   by Hydro, required by any regulations, recommended by manufacturers,  
4                   or resulting from inspections.

5