

1 Q. [Account P10 - Powerhouse] - As it relates to the statement made to the Company
2 in CA-NLH-109, that it has been Gannett Fleming's experience that powerhouses
3 will eventually require capital upgrades, please provide the specific experience
4 referenced as well as all other Gannett Fleming experience where powerhouses
5 have not incurred significant capital upgrades to ensure their integrity. For each
6 item of experience, identify the generating station, utility, dates of capital upgrades
7 as well as dates of initial installation. Finally, provide all support, justification and
8 corresponding documentation as to why the experience of Gannett Fleming as it
9 relates to capital upgrades would not also apply reasonably to 90R3 and 100R3 life-
10 curve combinations.

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13 A. Information provided to Gannett Fleming in the course of completing depreciation
14 studies is provided within the terms of strict confidentiality clauses. Gannett
15 Fleming will not disclose the detailed information as requested as it would cause
16 breach of contracts with other clients. Schedule 2 of the Gannett Fleming report
17 provides the name and year of the peer information utilized by Gannett Fleming.
18 Gannett Fleming notes that any information entered into the proceeding would be
19 in the public records. Gannett Fleming does not have any additional information in
20 its possession at this time.